



# Agenda



**HYNDBURN**

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## Cabinet

**Thursday, 12<sup>th</sup> September 2019 at 1.30 pm,**  
Queen Elizabeth Room, Scaitcliffe House, Ormerod Street, Accrington

### Membership

Chair: Councillor Miles Parkinson OBE (in the Chair)

Councillors Paul Cox, Munsif Dad BEM JP, Joyce Plummer, Loraine Cox and Jenny Molineux

## AGENDA

### PART A: PROCEDURAL AND INFORMATION ITEMS

1. **Apologies for Absence**
2. **Declarations of Interest and Dispensations**

3. **Minutes of Cabinet** (Pages 5 - 16)

To approve the minutes of the last meeting of the Cabinet held on 17<sup>th</sup> July 2019.

4. **Minutes of Boards, Panels and Working Groups** (Pages 17 - 20)

To receive the minutes of the meetings of the following bodies:

Cabinet Waste and Recycling Group
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10 <sup>th</sup> June 2019
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### PART B: PORTFOLIO ITEMS



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Published on Wednesday, 4 September 2019

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**5. Reports of Cabinet Members**

To receive reports from Cabinet Members.

**Leader of the Council (Councillor Miles Parkinson)**

**6. Core Strategy Review and Site Allocations DPD - Regulation 18(2) Consultation Summary and Representations (Pages 21 - 176)**

Report attached.

**Deputy Leader of the Council (Councillor Paul Cox)**

**7. Food and Safety Service Plan 2019/20 (Pages 177 - 200)**

Report attached.

**8. Report of Urgent Cabinet Decision - Mercer Park Skate Boarding Facility (Pages 201 - 214)**

Report attached.

**Portfolio Holder for Resources (Councillor Joyce Plummer)**

**9. Council Tax Support Consultation (Pages 215 - 244)**

Report attached.

**10. Financial Position July 2019 - Report for the Year Ending 31st March 2020 (Pages 245 - 248)**

Report attached.

**PART C: EXEMPT ITEMS**

**11. Exclusion of the Public**

**Recommended** That, in accordance with Section 100A(4) Local Government Act 1972, the public be excluded from the meeting during the following items, when it is likely, in view of the nature of the proceedings that there will otherwise be disclosure of exempt information within the Paragraphs of Schedule 12A of the Act specified at the items.

**Details of any representations received by the Executive about why the following report should be considered in public – none received.**

Statement in response to any representations – not required.

**Leader of the Council (Councillor Miles Parkinson)**

12. **Report of Urgent Cabinet Decision - Waive contract procedure rules to extend the current contract to install and maintain Christmas Decorations and Amenity Lighting in Hyndburn** *(Pages 249 - 254)*

Report attached.

13. **Barnfield & Hyndburn Partnership** *(Pages 255 - 258)*

Report attached.

**Portfolio Holder for Housing and Regeneration (Councillor Loraine Cox)**

14. **Emergency Decision to Waive Contract Procedure Rules to Appoint a Fire Safety Consultant** *(Pages 259 - 262)*

Report attached.

Portfolio Holder for Education, Leisure and Arts (Councillor Munsif Dad)

15. **Loan to Hyndburn Leisure Ltd** *(Pages 263 - 266)*

Report attached.

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## CABINET

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**Wednesday, 17th July, 2019**

**Present:** Councillor Miles Parkinson OBE (in the Chair), Councillors Paul Cox, Munsif Dad BEM JP, Joyce Plummer, Loraine Cox and Jenny Molineux

**In Attendance:** Councillors Tony Dobson, Glen Harrison, Marlene Haworth and Eamonn Higgins

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**58 Apologies for Absence**

There were no apologies submitted.

**59 Declarations of Interest and Dispensations**

There were no reported declarations of interest or dispensations.

**60 Minutes of Cabinet**

The minutes of the meeting of Cabinet held on 5<sup>th</sup> June 2019 were submitted for approval as a correct record.

**Resolved** - **That the Minutes be received and approved as a correct record.**

**61 Minutes of Boards, Panels and Working Groups**

The minutes of the following meeting were submitted:

- Cabinet Committee – Street Naming – 20 March 2019

**Resolved** - **That the Minutes be received and noted.**

**62 Reports of Cabinet Members**

There were no reports provided by Cabinet Members present at the meeting.

**63 Overview and Scrutiny Work Programmes**

The Leader of the Council reported that the Cabinet was requested to give consideration to and comment on the draft work programmes for Overview and Scrutiny for 2019/20.

Approval of the Report was not deemed a key decision.

*Reason for Decision*

At the beginning of each municipal year, the Council's Overview and Scrutiny Committees each agree a work programme for the year. The process for agreeing the work programme is set out in Overview and Scrutiny Procedure Rule C6(a).

A draft work programme for each of the Committees was provided for comment. Following consideration by the Cabinet, the draft will be returned to both Scrutiny Committees along with any comments made. The Scrutiny Committees will then approve a full programme which will be submitted to the next meeting of Cabinet. Due to the timings of meetings this year it is proposed that the Overview and Scrutiny Officer will circulate any comments from Cabinet to Committee members, with a final programme being approved at the next meeting.

The work programmes have been developed following consultation including:

- Multiple emails to all Councillors;
- Suggestions sought from all service managers;
- Informal meeting with the Cabinet.

Thirteen items were suggested by Councillors (including one item which was suggested separately by multiple Councillors). Seven of these items have been added to the work programme. Of the remaining six, one has been marked as a possibility pending further information while the others have been rejected. No items were submitted by Service Managers.

A full list of items submitted by Councillors and reasons why they have been included / not included is provided in the main report. However, a summary is shown below:

Fly Tipping/Littering	Included - Resources OSC
Graffiti	Included - Resources OSC
Disabled Facilities Grants (DFGs)	Not included
Council support for Voluntary Community and Faith Sector (VCFS) organisations	Not included
GPs lack of funding, recruiting new GPs, reduced working arrangements	Not included
Town Centre Events	Included – Resources or Communities and Wellbeing OSC
Homelessness referral scheme	Not included
Kingdom	Included - Resources OSC
New waste collection system	Included - Resources OSC
Hyndburn's Recovery Process for Council Tax Arrears	Included - Communities and Wellbeing OSC
Universal Credit	Included - Communities and Wellbeing OSC
Taxi Licensing	Not included
Management of green space associated with new housing development	Subject to further discussions with Chief Planning Officer

Meetings with the chairs and vice chairs also took place, and items for the work programme were discussed and selected in accordance with the Criteria for Selecting Work Programme Items. In addition, Cabinet members were invited to a work programme meeting with the chairs and vice chairs of both committees to put forward potential items.

Items had been provisionally allocated to specific meetings. However, these may be subject to change during the year, particularly where they involve the attendance of external and partner organisations.

As in previous years, additional items can be added to the work programmes as the year progresses.

*There were no alternative options for consideration or reasons*

**Resolved** - **That Cabinet notes the work programmes for the Overview and Scrutiny Committees contained in the Appendix to the report.**

#### **64 Housing Renewal Policy**

Councillor Loraine Cox, Portfolio Holder Housing and Regeneration, reported on a proposed new Housing Renewal Policy. In her introduction to the report Councillor Cox indicated that a cross-party working group would be established, reporting to the Regeneration and Housing Panel, to consider access to and the availability of Disabled Facilities Grants. The Leader of the Council and Councillors Tony Dobson and Munsif Dad also spoke in favour of the proposals.

Approval of the report was deemed a key decision.

*Reasons for Decision*

The Regulatory Reform (England and Wales) (Housing Assistance) Order 2002 (the RRO) grants a general power on local authorities to provide “assistance” “in any form” “to any person”, to improve, repair, adapt or rebuild residential premises.

The RRO reflects the view that it is primarily the responsibility of private sector owners to maintain their own property but it recognises that some owners, particularly the elderly and most vulnerable, do not have the necessary resources to repair or improve their homes. Local authorities therefore, subject to resources, have an important role to play in providing assistance in these cases.

Hyndburn has such a RRO Policy, or probably better described, a Housing Renewal Policy in place which was last reviewed in 2006.

Following a review, a new Housing Renewal Policy is proposed, a copy of which was provided at Appendix 1 of the report. The Policy identifies the forms of assistance, including financial assistance that will be available from the Council to assist vulnerable occupiers in all tenures including disabled people to improve or

adapt their homes, the eligibility criteria for assistance and the terms upon which this assistance will be provided.

Historically, the Council has utilised the Capital Programme to fund housing renewal activity. Due to austerity measures including public sector funding cuts there is very little money now available to support housing renewal activity. However, one area where funding is increasing is for Disabled Facilities Grants (DFG's). In 2019/20 the Council is due to receive nearly £1m. DFG funding forms part of, and is allocated through the Better Care Fund (BCF). This fund is allocated to upper tier authorities (i.e. Lancashire County Council) then passed onto the Districts under ring fencing arrangements and it is expected that health priorities will become more important in the way DFG funding is spent.

RRO policies include the use of DFG funding, now allocated via the BCF as described above. This now enables local authorities to use specific DFG funding for wider purposes. Therefore, subject to an approved RRO, DFG funding can be used beyond mandatory DFG's to support vulnerable households remaining in their existing homes. There is, therefore, an opportunity to use the additional DFG funding to support wider measures, subject to a new RRO (Housing Renewal Policy).

A summary of the key policy areas in the new Housing Renewal Policy is as follows:

- Education and Encouragement;
- Direct Financial Assistance, including:
  - Mandatory Disabled Facilities Grants (DFG's) up to £30,000;
  - Discretionary Disabled Facilities Grants (DFG's);
  - Additional Assistance for Vulnerable Households, (subject to funding and liquid assets/savings not exceeding £25,000);
  - Facelift grants forming part of a housing renewal scheme to improve the appearance and exterior of a block of dwellings (subject to funding);
  - Relocation Assistance usually where demolition is proposed under a Council led regeneration scheme (subject to funding);
  - Empty Homes - to bring long term empty homes back into use (subject to funding);
- Indirect Financial Assistance; and
- Enforcement

#### *Alternative Options Considered and Reasons for Rejection*

The Council is required to have a RRO Policy in place in order to provide various forms of housing assistance and, therefore, not having a Policy is not an option. The overall approach proposed is to provide housing assistance to the most vulnerable households across the Borough and those in greatest need.

**Resolved** - **That Hyndburn's new Housing Renewal Policy attached at Appendix 1 to the report be approved.**

**65 Workplace Cycle Pool Scheme**

Councillor Jenny Molineux, Portfolio Holder Health and Communities, reported on a proposal to implement a workplace cycle pool scheme. The Leader of the Council also spoke in favour of the proposed scheme.

Approval of the report was not deemed a key decision.

*Reasons for Decision*

The Access Fund Team at Lancashire County Council offers grants to businesses of up to a maximum of £5,000 which can fund schemes such as cycle parking/storage and/or promotion, walking or cycling promotion and awareness campaigns.

An application was submitted for the grant during 2018 for 4 cycles, 2 standard cycles and 2 electric cycles. The grant was approved and the Council received £2,745 in order to purchase the cycles and equipment from a local retailer.

The aim of the cycle pool is to encourage employees to use cycles for business use as an alternative to using their vehicles and also potentially to exercise at lunchtimes to improve health and wellbeing. The benefits of this scheme would be that some journeys can be made more quickly with no need to locate parking, there are health benefits from the physical activity of cycling including reducing the risk of strokes, diabetes and stress which ultimately improves the health of the workforce and leads to fewer absences. There would also be financial savings due to a reduction in car mileage expenses. Cycling is more environmentally friendly, reducing greenhouse gas emissions, contributing to improvements in air quality and reducing congestion. It also leads by example to our residents and businesses showing that the Council is committed to reducing harmful emissions and making greener travel choices.

The report includes further information about:

- Consultation;
- Cycle Storage;
- Cycle Pool Scheme Guidelines;
- Cycle Maintenance;
- Insurance; and
- Training.

*There were no alternative options considered or reasons proposed for rejection*

**Resolved** **(1) That the implementation of a workplace cycle pool scheme as outlined in Appendix 1 of the report be approved.**

**(2) That the cycle storage located at the Markets be relocated to Scaitcliffe House to provide secure cycle storage.**

**66 Financial Position March 2019 - Report for the Year Ending 31st March 2019**

Councillor Joyce Plummer, Portfolio Holder Resources, reported on the financial spending of the Council up to the end of March 2019 and the financial outturn position for the Accounting Year 2018/19. Members considered a table within the report, which set out the core financial details. Councillor Marlene Haworth enquired about the future plans for the Market Hall and a response was provided by the Leader of the Council, in which he referred to the both Market Hall and the wider retail offer in Accrington town centre, as well as national trends. Members considered the desirability of a cross-party approach to planning the future of Accrington town centre.

Approval of the report was not deemed a key decision.

*Reason for Decision*

The spend for the financial year to the end of March 2019 is £10,593,544 compared to a Budget of £11,074,538 giving a positive variance of £481,000 over the year.

Positive variances were achieved in most of the Council's significant budget areas with only the Town Centre & Markets Budget and Regeneration & Property Services recording adverse variances of any notable size. Service level details are summarised as follows:

Environmental Services

Food Safety reports that net expenditure will be £80,000 less than Budget by the year end. This is due to salary savings of £30,000, £27,000 of miscellaneous cost savings and additional extra income of £23,000.

Waste Services reports a positive variance for the financial year of £270,000. This is due to salary savings of £50,000, income up compared to Budget by £33,000 and miscellaneous savings of £84,000 plus other savings against budget of £103,000.

The Parks & Cemeteries Service reports an adverse variance of £10,000. This is due to a predicted shortfall on the Parks Budget of £49,000, stemming from £6,000 of increased staff costs, as well as £22,000 of lost income on football pitch hire over the year, £4,000 of reduced income from Lancashire County Council as well as £10,000 less income from tree work, along with £7,000 of additional miscellaneous costs. The Cemetery Service is predicting a net increase of income this year of £25,000 and £24,000 of savings on miscellaneous costs, less £10,000 of increased salary costs.

The Town Centre & Market Budget shows an overall adverse variance of £130,000. This is attributable to the continuing economic pressures limiting the generation of funds from the Market Hall in Accrington by £182,000 compared to Budget and

other income down £10,000, offset by £13,000 of salary savings and £49,000 of miscellaneous additional savings.

### Culture & Leisure Services

Culture and Leisure Services are indicating a positive variance of £47,000, stemming from savings across operational budgets.

### Planning & Transportation

Planning & Transportation are predicting an adverse variance for the year of £3,000. This is due to a predicted shortfall in income compared to budget on Building Control of £65,000, additional staff cost in this area of £16,000 and £7,000 of additional miscellaneous cost. Elsewhere on the Budget there are £39,000 of staff savings and £41,000 of additional income and £5,000 of miscellaneous additional savings.

### Regeneration & Property Services

Regeneration & Property Services reports a negative variance position for the year of £137,000, with income up by £93,000, offset by an extra £40,000 of salary costs and £95,000 of miscellaneous costs, plus £95,000 of additional emergency repairs and maintenance expenditure.

### Policy & Corporate Governance

Policy & Corporate Governance reports a positive variance of £217,000. This is due to £303,000 of salary savings predicted for the year, less £107,000 of corporate savings, increased income above budget of £279,000, savings on pension expenditure of £79,000, less £155,000 of additional Housing Benefit spend and £182,000 of increased miscellaneous expenditure.

### Non Service Items

The current estimate for the year is a positive variance of £148,000.

*There were no alternative options considered or reasons proposed for rejection*

**Resolved** – **That Cabinet notes the report on the financial outturn position for the year ending 31<sup>st</sup> March 2019.**

## **67 Capital Report - Outturn 2018/19**

Councillor Joyce Plummer, Portfolio Holder Resources, reported on the financial spend on Capital Projects during 2018/19. The full details of expenditure were provided in Appendix 1 of the report and a proposed list of changes to the 2019/20 Capital Programme was shown at Appendix 2. These will be funded from the amounts not spent but authorised in 2018/19.

Councillor Tony Dobson enquired about waste recycling rates and the Leader of the Council and Councillor Paul Cox responded that these were due to be discussed by the Resources Overview and Scrutiny Committee in 2019/20. Councillor Marlene Haworth enquired about the Harvey Street Garden Area project and the Executive Director (Environment) agreed to provide a written response. Councillor Glen Harrison thanked the officers for their work in ensuring that nine of the Borough's parks had achieved green Flag Status.

Approval of the report was not deemed a key decision.

#### *Reasons for Decision*

The outturn position for 2018/19 on Capital Expenditure shows a fifteenth year of major capital investment by the Council. The overall investment by the Council in the year was just over £5.6m against an authorised maximum budget of £10.9m. The overall programme was underspent by £765,000 this year.

The Council has received applications for net slippage of £1.41m comprising £4.52m of expenditure schemes moving from 2018/19 to 2019/20 and £3.11m of income. These will be submitted for approval to the Audit Committee in July 2019.

The Council has maintained its prudent approach to Treasury Management during the year. The Prudential Indicators demonstrate small positive movements between last year's position and the outturn for this year.

Figures reported are the latest available and may be subject to change in finalising the accounts or after the conclusion of the final accounts audit. If the figures change significantly from those contained in this report an update on the overall position will be made to Cabinet at a later date.

The Capital Programme for 2018/19 was approved by the Council on the 22<sup>nd</sup> February 2018. The programme for 2018/19 outlined continuing major investment in the local community and in the Council's key priorities.

The report includes further details in respect of the following:

- Record levels of investment;
- Positive achievements in managing the programme within overall resources;
- Two individual projects with significant underspends (purchase of wheeled bins and Rishton regeneration project);
- One area of significant adverse variance (improvements to Rhyddings Park, Oswaldtwistle);
- Monitoring and reporting processes;
- Avoiding additional borrowing;
- Funding sources;
- Receipts; and
- Treasury Management.

Major high spots within the Capital Programme 2018/19 are as follows:

- Work was completed on £2m Accrington Town Square redevelopment, extensively renovating and improving this area for community, retail and recreational use and highlighting the significant heritage of the buildings surrounding the main public realm within Hyndburn.
- The Council completed its major £2m investment into Rhyddings Park extensively upgrading the facilities within the Park and restoring the Coach House and Kitchen Garden for community use.
- The Council also invested almost £250,000 into Rishton as part of a major housing regeneration project.
- The Council implemented a new recycling programme for paper, glass and plastics spending £1.2m on providing new recycling bins to residents to allow the easier disposal and collection of recycling materials and improve the tidiness of our streets. It also replaced 4 of its key kerbside collection vehicles at a cost of £331,000.
- New cremators were installed at Accrington Cemetery to replace the existing ones which were almost 25 years old and ensure this facility can operate success fully into the future.
- The Council contributed £250,000 towards the major highway improvement to the M65's Junction 7 and approach roads into Accrington to ease congestion into the Town Centre and improve traffic flow to Church and Oswaldtwistle.
- The Council made Disabled Facility Grants awards of almost £675,000 to ensure that those who have an illness or disability can continue to live independent lives in their own homes, if they wish to do so.

*There were no alternative options considered or reasons proposed for rejection*

**Resolved** - **That Cabinet notes the report and asks the Audit Committee to approve the Slippage items at Appendix 2 of the report.**

#### **68 Financial Position May 2019 - Report for the Year Ending 31st March 2020**

Councillor Joyce Plummer, Portfolio Holder Resources, reported on financial spending of the Council up to the end of May 2019 and the financial forecast outturn position for the Accounting Year 2019/20. Members considered a table within the report, which set out the core financial details. Councillors also thanked the Corporate Management Team and the Deputy Chief Executive's team for their work in maintaining the Council's positive financial position.

Approval of the report was not deemed a key decision.

*Reason for Decision*

The spend for the first 2 months of the financial year to the end of May 2019 is £1,790,959 compared to a Budget of £1,889,915 giving a positive variance of £99,000 over the first 2 months of the year.

The current forecast spend to the end of the financial year in March 2020 is £10,850,000 compared to a Budget of £10,994,000. This forecast produces a positive variance of £143,000. There are small adverse variances for Planning & Transportation and Policy & Corporate Governance with a more significant adverse variance on Town Centre & Markets of £155,000. These adverse variances are offset by predicted savings elsewhere on the Budget during the year. Service level details are summarised as follows:

### Environmental Services

Food Safety is predicting that net expenditure will be £4,000 less than Budget by the year end. This is due to salary savings of £4,000.

Waste Services are predicting a positive variance for the financial year of £87,000. This is due to Savings on the Recycling Budget of £103,000 and £16,000 of additional income compared to Budget less £31,000 of extra salary costs and £1,000 of additional miscellaneous expenditure.

The Parks & Cemeteries Service is forecasting a break even outturn at this point in the year.

The Town Centre & Market Budget shows an overall adverse variance of almost £155,000. This is attributable to the continuing economic pressures limiting the generation of funds from the Market Hall in Accrington by £144,000 compared to Budget and other income down £9,000 and £4,000 of miscellaneous additional costs, offset by £2,000 of salary savings.

### Culture & Leisure Services

Culture and Leisure Services are indicating a break even outturn position by the end of the year.

### Planning & Transportation

Planning & Transportation are predicting an adverse variance for the year of £33,000. This is due to a predicted shortfall in income compared to budget on Building Control of £65,000. Elsewhere on the Budget there are £3,000 of staff saving and £48,000 of additional income less £19,000 of miscellaneous additional expenditure.

### Regeneration & Property Services

Regeneration & Property Services are predicting a break even position by the year end with additional income of £157,000 offset by £144,000 of additional staff costs and £13,000 of additional miscellaneous spending.



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## CABINET WASTE AND RECYCLING GROUP

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**Monday, 10th June, 2019**

**Present:** Councillor Paul Cox (in the Chair), Councillors Michael Miller

**Apologies** Stephen Button and Joyce Plummer

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### **22 Apologies for Absence and Substitutions**

Apologies for absence were submitted on behalf of Councillors Button and Plummer.

There were no substitutes for absence.

### **23 Declarations of Interest**

There were no declarations of interest.

### **24 Minutes of the Last Meeting held on 4th October 2018**

The Minutes of the last meeting held on 4<sup>th</sup> October 2018 were submitted for approval.

Councillor Miller requested that an amendment be made to the minute relating to 'New Recycling Service Update' to accurately reflect his concern with regards to the licensing of Rishton Recycling Company. He reported that he had been informed by the Environment Agency that this Company did not hold a relevant licence to process co-mingled material. He expressed concern that the Council had failed to ensure that relevant permits were in place before procuring the services of Rishton Recycling Company. He referred to the importance of ensuring that the Council had an understanding of what permits were legally required and if these requirements were met before procuring services.

The Deputy Head of Environmental Services reported that the Council were currently working with the Environment Agency on this issue and that no enforcement action had been required.

The Chair thanked Councillor Miller for the issues he had raised and indicated that processes were being put in place to ensure a more robust system for procuring waste services.

#### **Agreed**

- **That the Minutes be received and approved as a correct record subject to an amendment to item 18 – New Recycling Service Update for the following to be included in the minute – 'Councillor Miller expressed concern in relation to some recycling processes carried out by Rishton Recycling Company.**

### **25 Matters Arising**

There were no matters arising.

## **26 New Recycling Service Update**

The Deputy Head of Environmental Services reported on the implementation of the new recycling service and its successful delivery.

Councillor Miller requested that confirmation was sought on whether mixed plastics could still be recycled and if the appropriate licences and permits were held by Rishton Recycling Ltd. He referred to the Council's responsibility in respect of exporting waste materials.

The Chair referred to the problem of some local authorities meeting targets for green waste recycling and that this had been raised at the Lancashire Waste Partnership. He explained the difficulties of improving rates for recycling due to many properties in Hyndburn being terraced with no gardens. Members discussed the difficulty for Hyndburn to compete with the likes of the Ribble Valley and Councillor Miller suggested that rates should be recorded as a ratio to reflect the differing environments of local authorities.

**Agreed** - **That the Working Group be updated on the licences and permits held by Rishton Recycling Ltd. at the next meeting of the Cabinet Waste and Recycling Group.**

## **27 Recycling Collections**

The Deputy Head of Environmental Services reported on a slight increase in domestic recycling tonnage on the previous financial year but pointed out that there had been a 50% reduction in garden waste since the introduction of charges. However, he reported that there had been fewer incidents in relation to recycling waste collections since the introduction of the new bins rather than bags.

Councillor Miller expressed concern about the deposit return system (DRS) and whether the system would work financially with supermarkets and take-aways and referred to the current environmental strategies not being robust enough to cope with issues such as a reduction in waste collection.

**Agreed** - **That the report be noted.**

## **28 Recycling Material Value**

The Chair reported on the recycling material values and the difficulties in making any profit. He explained that the price for paper and cardboard had decreased significantly from 2017 to 2018 and pointed out that there would have to be an increase in price before any resulting profit share with Lancashire County Council.

Councillor Miller referred to the financial constraints being felt in the market and the difficulties of making any profit.

**Agreed** - **That the report be noted.**

## **29 Garden Waste Subscription Service**

The Chair reported on the continuation of garden waste subscriptions at a cost of £30 per bin per annum and that these were available to be purchased from 1<sup>st</sup> June 2019.

**Agreed** - **That the report be noted.**

**30 Household Waste Recycling Centre (Whinney Hill)**

The Deputy Head of Environmental Services reported on a review of the Household Waste Recycling Centre by Lancashire County Council and changes to opening hours. He reported that Whinney Hill would remain open seven days per week.

Councillor Miller agreed that commercial users should be charged for waste disposal but suggested that putting charges in place, in general, could stop people from using the Centres. He also referred to the recycling contribution made by charities and the cost benefit of this.

**Agreed - That the report be noted.**

**31 Enforcement**

The Deputy Head of Environmental Services referred to strategies put in place to prevent littering. He referred to the employment of Kingdom Services Group and outlined the number of fixed penalty notices issues. He indicated that there had been a noticeable reduction in street litter within Accrington Town Centre. He explained that this service would be replicated across other townships in the borough.

Councillor Miller agreed with the strategy implemented. The Chair reported that parks would also be included in enforcement against litter.

**Agreed - That the report be noted.**

**32 Commercial Collections**

The Deputy Head of Environmental Services reported that the number of commercial collections was at its capacity.

Councillor Miller reported that the bins on Thorneyholme Road were overflowing and requested that this be looked into. He also suggested that consideration was given to a separate food waste collection. The Deputy Head of Environmental Services referred to the problems of adopting strategies that dealt with alternative waste collection bodies.

**Agreed - That the report be noted.**

**33 Time and Date of Next Meeting**

That the next meeting of the Cabinet Waste & Recycling Panel be held at a time and date in approximately 4 months' time and that Panel Members be informed of this date.

Signed:.....

Date: .....

Chair of the meeting  
At which the minutes were confirmed



# Agenda Item 6.

<b>REPORT TO:</b>		Cabinet	
<b>DATE:</b>		12 September 2019	
<b>PORTFOLIO:</b>		Cllr Miles Parkinson, Leader	
<b>REPORT AUTHOR:</b>		Principal Planning Officer - Policy	
<b>TITLE OF REPORT:</b>		Core Strategy Review and Site Allocations DPD – Regulation 18(2) consultation summary and representations	
<b>EXEMPT REPORT (Local Government Act 1972, Schedule 12A)</b>	<b>Options</b>	Not applicable	
<b>KEY DECISION:</b>	<b>Options</b>	If yes, date of publication:	No

## 1. Purpose of Report

- 1.1 To notify Cabinet of the outcome of the second public consultation exercise held on the Core Strategy Review and Site Allocations DPD (held 26 February 2019 – 8 April 2019), and to seek Cabinet approval of the next stages of work on the Local Plan.

## 2. Recommendations

- 2.1 That Cabinet notes the outcome of the public consultation exercise and the representations received during the second stage of public consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.2 That Cabinet agrees the ‘Proposed Council Response’ to representations and notes the proposed approach set out in this report on the next steps in preparing the Local Plan.

## 3. Reasons for Recommendations and Background

- 3.1 The Core Strategy Review and Site Allocations DPD form central parts of the new Local Plan for Hyndburn; the Core Strategy sets the strategic overarching planning policy framework for the Borough, including setting housing and employment growth figures; the Site Allocations DPD will identify specific sites for development to help

meet the planned growth over the plan period, and also the sites to be protected from development.

3.2 In February 2019 Council approved three consultation papers to be the subject of a public consultation exercise on the Core Strategy Review and Site Allocations DPD. The consultation papers were:

- Core Strategy Review: Regulation 18(2) Consultation Draft
- Core Strategy Review: Growth Option and Spatial Option Justification Paper
- Site Allocations DPD: Regulation 18(2) Consultation Draft

3.3 These documents built upon an initial public consultation exercise on the Local Plan documents that was approved by Cabinet in February 2018, and took place between February and April 2018 (outcomes reported to Cabinet 18 July 2018).

### The Consultation Process

3.4 The formal consultation process on the Regulation 18(2) documents took place over a 6-week period between 26 February 2019 and 8 April 2019<sup>1</sup>. In addition to the usual methods of consultation (press, social media, public notices etc.) a number of public drop-in events were also held around the Borough. The table below summarises some of the key statistics relating to public engagement in this Local Plan process. All measures highlight a significant increase in public participation between the 2018 and 2019 consultation exercises.

Engagement measure	2018	2019
Public drop-in events (attendees signing in)	104	223
Consultation video (unique online views)	217	506
Formal submissions (no. of contacts)	23	107
Formal Submissions (no. of individual representations)_	141	649

3.5 In total during this consultation exercise 223 people attended the drop in sessions and had an opportunity to view the consultation video, display boards, and have discussions with Council Officers and Members about the consultation process. A breakdown of the attendance at each of the events is provided below.

Event Date	Event venue	No. of attendees
04/03/2019	Rishton Conservative Club	22
06/03/2019	Arthur Wilson Centre, Clayton le Moors	16
07/03/2019	Town Hall, Accrington	17
13/03/2019	Churchfield House, Great Harwood	63

<sup>1</sup> undertaken in line with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement

14/03/2019	Hippings Vale Community Centre, Oswaldtwistle	12
26/03/2019	Huncoat Primary School, Huncoat (plus additional Huncoat Masterplan event 30/3 at St. Augustine's)	93

## Consultation Responses

- 3.6 A total of 107 individuals/organisations responded to the consultation using the formal response forms or writing/emailing comments directly. Due to the fact that the consultation material included both draft policies (set out in the Core Strategy Review document) and potential site allocations, alongside a Sustainability Appraisal of the options, some formal submissions were lengthy and complex in nature. Officers have reviewed all the responses received and identified a total of 649 individual comments/representations as a result of the submissions received.
- 3.7 Representations have been summarised by Officers and attributed to one of four categories depending upon their nature:
- **Core Strategy Review** – relates to a policy or paragraph of the Core Strategy Review consultation draft (260 individual representations);
  - **Site Allocations DPD** – relates to one of the 179 site options set out in the Site Allocations DPD, or relates to the written part of the Site Allocations DPD (371 individual representations);
  - **Sustainability Appraisal** –relates specifically to the supporting Sustainability Appraisal documents (10 individual representations); or
  - **Other** –refers to any other supporting documents (for example the Growth Option and Spatial Option Justification Paper) (8 individual representations).
- 3.8 Officers have classified each representation as either 'Support', 'Object', 'General Comment', or 'Not Stated' if unclear. Specific policy, site, paragraph or page references of the relevant consultation document(s) have also been included. The attached Appendices 1-4 set out the Officer summaries of the 649 representations received alongside a proposed Council response / further action and associated notes<sup>2</sup>. Cabinet is asked to review and approved the attached reports to ensure that relevant further work can proceed, and that preparation of the Local Plan can continue.
- 3.9 Original copies of the full representations are available for Members to view in the Council's offices.

## Overview of representations

### *Core Strategy Review*

<sup>2</sup> Proposed response is either: 'Noted'; 'Further consideration required'; 'Agree – make change'; or 'Disagree – no change'

- 3.10 A total of 260 individual representations have been identified relevant to the Core Strategy Review consultation draft document. These cover a wide variety of issues. All draft policies except for one (Policy CS11: Gypsy and Traveller and Travelling Showpeople Provision) had representation(s) made against it. Table 1 highlights the policies from the consultation draft document which received the most number of representations broken down by representation type.

**Table 1: Policies in the Core Strategy Review receiving the highest number of reps**

Policy Ref	Support	Object	General Comment	Not Stated	Total
CS1: The Spatial Development Strategy	9	3	12	12	36
CS9: Housing Provision (including affordable housing)	10	6	7	6	29
CS12: Sustainable Development & Climate Change	3	-	6	4	13
CS2: Huncoat Garden Village	3	2	3	4	12
CS30: Rishton	-	9	1	1	11
CS6: Open Space and Local Green Space Provision	2	4	4	-	10
CS10: Suitable Range of Housing	2	1	5	2	10
CS29: Huncoat	-	-	5	4	9

- 3.11 Table 1 demonstrates the fact that representations are often not explicitly objecting to elements of the Core Strategy. Many representations at this stage are general comments or comments of support. Of all 260 representations received on the Core Strategy only 48 (18.5%) clearly stated objection to elements of the plan. Appendix 1 provides further details of all the representations received along with a proposed Council response to each.

#### *Site Allocations DPD*

- 3.12 A total of 371 individual representations have been identified relevant to the Site Allocations DPD consultation draft document. The majority of these (341) related to specific sites put forward as 'reasonable alternative' site options for allocation in the new Local Plan. Of representations relating to specific sites, 179 (52.5%) were objections and 66 (19.4%) were support. The remaining reps were either General Comments or Not Stated.
- 3.13 Table 2 highlights the site options from the consultation draft document which received the most number of representations broken down by representation type.

**Table 2: Site options set out in the Site Allocations DPD receiving the highest number of reps.**

Site Ref	Support	Object	General	Not	Total
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			Comment	Stated	
202: land at Cottams Farm, Clayton-le-Moors	-	23	-	2	25
103: land to the northeast of Cut Lane, Rishton	-	21	1	1	23
105: land between Blackburn Rd & M65, Rishton	1	3	5	-	9
145: land at Park Road (off Hermitage St), Rishton	7	2	-	-	9
63: land north of Harwood Lane, Great Harwood	1	7	-	-	8
38: Taylors Yard, Spring St South, Rishton	6	-	-	-	6
66: York Mill, Livesey St, Rishton	5	-	-	1	6
69: land off Knowles St, Rishton	5	-	1	-	6
82: land to west of Brookside, Oswaldtwistle	-	3	1	2	6
87: land off Harwood Lane, Great Harwood	2	4	-	-	6
56: land off Whalley Road, Clayton-le-Moors	1	2	1	1	5
85: land bound by Hindle Fold Lane & Uppercliffe, Great Harwood	2	2	1	-	5
106: Whitebirk Moss, Rishton	-	2	2	1	5
135: Holt Mill, Hermitage St, Rishton	2	2	1	-	5

- 3.14 A total of 30 representations were received that did not relate to specific sites from the 'reasonable alternatives' that were set out. These referred to aspects of the Site Allocations DPD Consultation Draft report (and methodology). Appendix 2 provides further details of all the representations received along with a proposed Council response to each.

*Specific issues raised at the public drop-ins and through public contact*

- 3.15 Although Officers were not formally recording concerns and issues raised at the drop-ins (instead encouraging attendants to complete a representation form) some key themes emerged from discussions with those who attended the events, and from phone calls received during the consultation period. These themes were also reflected in the formal representations and will need addressing through policies in the Local Plan as it is progressed.
- 3.16 The most common issues raised repeated those set out during the first Local Plan Regulation 18 consultation undertaken in 2018. These included questioning the need for growth in housing, infrastructure provision (particularly highways improvements and school provision), regeneration aspirations (re-development of brownfield sites before consideration of green field Green Belt sites) and adoption of an effective strategy for Accrington Town Centre to improve the offer.
- 3.17 In addition a number of residents raised concern over the manner in which the consultation had been advertised. Those living immediately adjacent to the 179

'reasonable alternative' site options were not directly informed of the consultation and this caused concern to some residents who found out through 'word of mouth' only. It is proposed that for the next public consultation to be held in 2020, properties adjacent to the proposed allocations which are shortlisted are all directly informed of the consultation exercise as this will be a more manageable number of properties.

### Call for Sites update

3.18 As part of the consultation process the Council also notified all interested parties of the closure of the 'Call for Sites' exercise to enable a definitive list of site submissions to be prepared in readiness for preparing the Publication version of the Local Plan in 2020. This proved successful in widening the pool of sites further as an additional nine sites have now been submitted for consideration during (or since) the consultation period ended.

Call for Sites reference and location	Proposed use of land
CFS-106 – Land off Alan Ramsbottom Way	Leisure (bike park)
CFS-107 – Land to rear of 526 Burnley Road, Huncoat	Residential
CFS-108 – Land at Riverside View, off Lower Barnes St, Clayton-le-Moors	Residential
CFS-109 – Land at rear of 542 Burnley Road, Huncoat	Residential
CFS-110 – Land south of Lee Lane, Great Harwood	Residential
CFS-111 – Land at Higher Side Beet Farm, Side Beet Lane, Rishton	Residential or employment or both
CFS-112 – Land at Lower Side Beet Farm, Side Beet Lane, Rishton	Residential or employment or both
CFS-113 – Smithacres, Back Lane, Baxenden	Traveller Site
CFS-114 – Land at Lower Side Beet Farm adjoining canal, Site Beet Lane, Rishton	Residential or employment or both

3.19 These additional Call for Sites submissions are available to view on the Council's website alongside all previously submitted Call for Site forms.

- Forms - the forms themselves can be viewed through the Council's planning application 'Search Applications' webpage – enter text in the application number field '[Call for Sites](#)'.
- eGGP - all site submissions, along with details of the proposed use of the site, are also available to view on the Council's online mapping system [eGGP](#) (select 'POLICY' Category, then 'Call for Sites').

3.20 The Council will consider these new submissions in accordance with the agreed Site Assessment Methodology and they will be taken into account in selecting the shortlist of sites to take forward to the Publication stage of the Local Plan in 2020 (see below for further details).

## **Local Plan – next steps**

- 3.21 A number of further pieces of evidence are now being prepared and commissioned to ensure that the Council can finalise policies in the Core Strategy and select its preferred sites for allocation in 2020. Whilst it is still planned to produce a Publication version Local Plan (under Regulation 19) in 2020, this will not be in February 2020 as set out in the current Local Development Scheme (LDS). A revised LDS setting out the new timetable of work will be brought to Cabinet in November 2019. This will set out: the reasons for any delays in Publication; the new timetable of work; any planned public consultation periods through to adoption of the Local Plan; and confirmation of the structure of the Local Plan.
- 3.22 Over the coming months the Council will use a number of different factors to help select its preferred sites to take forward for allocation in the new Local Plan including: representations set out in this Cabinet Report; evidence base reports; the findings of the sustainability appraisal work; and further information that has come forward on land availability and constraints. The Council will also undertake further consultation with neighbouring Local Authorities and other relevant organisations in preparation of the next stage of the Local Plan. The ‘Duty to Co-operate’ on Local Authorities requires that ‘Statements of Common Ground’ are produced on matters of strategic importance such as planning housing and employment growth, and strategic allocations of land.

## **4. Alternative Options considered and Reasons for Rejection**

- 4.1 The Core Strategy Review and Site Allocations DPD are being prepared in accordance with the Town and Country (Local Planning) (England) Regulations 2012. As the preparation of this document is to be in accordance with this legal framework there are no alternative options for its preparation.

## **5. Consultations**

- 5.1 A range of people and organisations have been involved in the evolution of the Core Strategy Review and Site Allocations DPD up to this point. This consultation exercise is the second statutory consultation period to be undertaken. The final consultation on the Publication version of the Local Plan (under Regulation 19) is expected to take place in 2020.
- 5.2 The Council publishes a Local Development Scheme (LDS) setting out the programme of work ahead on Local Plan matters. For a number of reasons there will now be a delay to Publishing the Local Plan (currently scheduled for February 2020). A separate

report will be brought to Cabinet in November 2019 setting out the reasons behind the delay and a new timetable for Publication, Submission and Adoption of the Local Plan.

- 5.3 The final version of both the Core Strategy Review and Site Allocations DPD that the Council wishes to adopt will also be the subject of an examination in public by an independently appointed Government Planning Inspector.

**6. Implications**

<p><b>Financial implications (including any future financial commitments for the Council)</b></p>	<p>There is a need to ensure that there is a robust evidence base in place for the Core Strategy Review and Site Allocations DPD which includes a number of further studies to take place over the next 18 months. Financial arrangements are already in place to fund this work.</p> <p>The Local Plan documents will also be subject to Examination in Public and there will be a need for the Council to fund this. The cost is likely to reflect the number of representations received at the 'Publication' stage (scheduled for early 2020), as yet unknown. Some funds have already been set aside for this purpose and Officers will seek to identify further funds over the coming 2 years.</p>
<p><b>Legal and human rights implications</b></p>	<p>Both the Core Strategy Review and Site Allocations DPD are part of the statutory development plan for the Borough. It is therefore the starting point for considering planning applications and should be given considerable weight in decision-making once they reach the 'Publication' stage. Once adopted, the documents will be given full-weight in decision-making.</p> <p>Consultation on the documents must be undertaken in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.</p>
<p><b>Assessment of risk</b></p>	<p>There are no significant risks associated with this decision.</p>
<p><b>Equality and diversity implications</b> <i>A <u>Customer First Analysis</u> should be</i></p>	<p>The Council is subject to the public sector equality duty introduced by the Equality Act</p>

<p><i>completed in relation to policy decisions and should be attached as an appendix to the report.</i></p>	<p>2010. When making a decision in respect of the recommendations in this report Cabinet must have regard to the need to:</p> <ul style="list-style-type: none"> <li>• eliminate unlawful discrimination, harassment and victimisation; and</li> <li>• advance equality of opportunity between those who share a relevant protected characteristic and those who don't; and</li> <li>• foster good relations between those who share a relevant protected characteristic and those who don't.</li> </ul> <p>For these purposes the relevant protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. When making a decision in respect of the proposals in this report members should have regard to the Customer First Analysis annexed to this report.</p>
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**7. Local Government (Access to Information) Act 1985:  
List of Background Papers**

7.1 *Copies of documents included in this list must be open to inspection and, in the case of reports to Cabinet, must be published on the website.*

Appendix 1: Representations made to the Core Strategy Review consultation draft

Appendix 2: Representations made to the Site Allocations DPD consultation draft

Appendix 3: Representations made to the Sustainability Appraisal of the Hyndburn Core Strategy Review and Site Allocations DPD consultation drafts

Appendix 4: Representations made to 'Other' documents or matters

**8. Freedom of Information**

8.1 The report does not contain exempt information under the Local Government Act 1972, Schedule 12A and all information can be disclosed under the Freedom of Information Act 2000.

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# Appendix 1: Representations made to the Core Strategy Review consultation draft

Comments and proposed Council response

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
829	Warren Hilton Highways England	General Comment			Highways England is charged with operating, managing capacity, maintaining and improving England's motorway and major A roads which form the Strategy Road Network (SRN). It is an ambition to ensure that major roads are more dependable, durable, and most importantly - safe. The SRN in Hyndburn comprises of the M65 motorway and the A56 trunk road. Junctions 6 and 7 of the M65 are within Hyndburn, while Junction 8 straddles the border of Hyndburn and neighbouring district of Burnley. While only small sections of the M65 and A56 run through Hyndburn, they are vital for the Borough and provide important connectivity to the economic centres of Preston and Manchester and onward connectivity to the wider SRN.	Noted
1033	Carole Woosey Environment Agency	General Comment			General comments/suggested additional points in relation to flood risk and increasing aquatic biodiversity value in the Borough in relation to the following matters: 1. measures to address heavily modified water courses linked to development opportunities (e.g. de-culverting, removal of barriers, reconnections with flood plains, improved riparian planting etc) 2. measures to address pollution from urban and rural sources, including uses of sustainable drainage and new farming rules' 3. Measures to reduce flood risk in terms of interventions to "slow the flow" and utilise natural flood risk management. This could include use of wetlands for water storage in peak flow, increase in tree cover in upland areas and use of "leaky" dams in open spaces.	Further consideration required  Consider where best to integrate comments into the Publication version
1034	Carole Woosey Environment Agency	Not Stated			We also note the aspiration to create a community recreation area / Country Park alongside an extension of Brookside Business Centre in the area of Green Belt to the west in Oswaldtwistle. This proposal and the improvement of the tow path between Whitebirk and Rishton may provide opportunities for environmental net gain and we would be keen to be involved in these schemes in so far as they relate to our remit.	Noted
1050	Mary Aubrey	Object			Considers Green Belt is precious, irreplaceable and finite resource.	Noted
1061	Nigel Aubrey	Object			Considers Green Belt is precious, irreplaceable and finite resource.	Noted

**Representations made to the Core Strategy Review consultation draft**

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1072	E Neville	Object			Considers Green Belt is precious, irreplaceable and finite resource.	Noted
847	Mohammed Ahmed Lancashire County Council (Environment Directorate)	General Comment			It would be helpful if the Core Strategy included more of a strategic narrative on the location and role of Huncoat as part of the East West Growth corridor. It would also be helpful to reference proximity to Junction 8 of the M65 and the importance of Junction 8 generally to East West growth aspirations. The proximity of Altham industrial Estate in relation to the Huncoat site is also something that could be emphasised demonstrating a cluster of economic/housing activity relating to a key motorway junction.	Agree - make change
846	Mohammed Ahmed Lancashire County Council (Environment Directorate)	Support			Lancashire County Council's Economic Development section supports the contents of the Core Strategy Review and Site Allocations DPD. In particular the Huncoat Site is recognised as a key strategic housing site within East Lancashire and is significant as part of the East West growth corridor referenced by Lancashire's Strategic Economic Plan. East-West growth is a key priority identified by the Northern Powerhouse Independent Economic Review.	Noted
844	Mohammed Ahmed Lancashire County Council (Environment Directorate)	General Comment			LCC School Planning Team has been involved with earlier Core Strategy consultation (in 2018) and are further engaged with Hyndburn BC - the current (forecast surplus of primary pupil places across the district as a whole for January 2019 is 723 places; for secondary schools it is 797. LCC will use the housing delivery across the district and the pupil yield it produces to update annually its forecast position for the next 5 year period. It will continue to work with Hyndburn BC and its consultants on the Huncoat Garden Village masterplan as detailed in policies CS2 and CS29.	Noted

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
830	Warren Hilton Highways England	General Comment			<p>Evidence informing the Local Plan comprises two key documents: 1) the East Lancs Highways and Transport Masterplan (2014) - the masterplan argues that it is vital to ensure the SRN in East Lancs is capable of supporting the demands which are placed upon it; and 2) Lancashire Cycling and Walking Strategy (2016-2026) - four key strategy themes of policy, place, people and promotion.</p> <p>The impacts of planned growth must be carefully considered in light of the SRN and impacts on air quality and traffic noise for those living nearby. The Council should also ensure that communities have access to a choice of alternative sustainable travel options. Highways England welcomes the opportunity to work with Hyndburn and LCC to address these concerns and issues.</p>	<p>Noted</p> <p>Further consultation to take place with Highways England and further evidence on Transport matters to be undertaken prior to Publication of the new Local Plan</p>
781	Andy McLaren Lichfields	General Comment			<p>It would be beneficial and logical if the Core Strategy &amp; Site Allocations DPD were combined and prepared as a comprehensive document. Bringing them forward comprehensively will ensure that delivery of the Site Allocations element takes place.</p>	<p>Further consideration required</p> <p>The Council will be publishing a revised Local Development Scheme later in 2019 which will confirm the future structure of DPDs making up the Local Plan</p>
1161	Adam Brennan United Utilities	General Comment			<p>recommend inclusion of additional policy in the plan relating to need to engage with the statutory undertaker for water for development proposals on water catchment land which is relevant to the Borough. In particular wind energy proposals whcould be located to minimise impact on public water supply. Recommended additional policy is provided.</p>	<p>Further consideration required</p> <p>Consider need for additional policy.</p>
1193	Angela Leigh Natural England	General Comment			<p>The Local Plan should give appropriate weight to the roles performed by the area's soils. They should be valued as a multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The plan should also safeguard the long term capability of the best and most versatile agricultural land (Grades 1, 2 and 3a).</p>	<p>Further consideration required</p> <p>Review policy framework on soils in Core Strategy and DM DPD</p>

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
681	Davina Helm Lancashire Constabulary Designing Out Crime Officers	General Comment			Identify strategic links in the Core Strategy Review to National, Regional and Local policies in relation to crime and security measures, rationale being to keep people safe and feeling safe; Section 17 of the Crime and Disorder Act 1998, NPPF 2018; Home Office 'Modern Crime Prevention Strategy 2016'	Further consideration required  Consider whether SA adequately addresses this already or whether specific amendments to the Core Strategy would be beneficial
1083	Kevin Parkinson	Object		1	Considers Green Belt is precious, irreplaceable and finite resource.	Noted
668	Andy McLaren Lichfields	Support	Strategic o	6	Taylor Wimpey supports the aim of Strategic Objective 1 and suggest they can help in the provision of executive and family housing of high quality which can bring significant benefits to the local economy to support local economic growth. Housing supply plays a key role in the flexibility of the local labour market.	Noted
682	Judith Douglas Judith Douglas Town Planning Limited	Support	Strategic o	6	Support Strategic Objective 1 to boost activity rates and support higher wage employment to counteract exporting of wealth out of the Borough. Also supports the release of attractive sites for new housing development to provide aspirational homes that will stem the loss of higher income earners out of the Borough who are seeking higher quality housing.	Noted
877	Daniel Owen RPS Consulting Services Ltd	Support	Vision	6	Support for overall Vision and particularly high importance given to Huncoat Garden Village. Refer to population decline and despite adoption of CS in 2012 many underlying challenges remain.	Noted
1204	Sport England	Support	Vision	6	Sport England support the vision, but would welcome inclusion of additional aspirations around enabling healthier residents, placing active design at the core of new development, and ensuring access to recreational and sporting facilities	Disagree - no change  Vision does make reference to 'healthier residents' already. The Council wish to keep the Vision as concise as possible

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
843	Mohammed Ahmed Lancashire County Council (Environment Directorate)	General Comment	Vision	6	We commend Hyndburn's intention to actively encourage sustainable travel; greater use of public transport, cycling and walking. The goal of Ensuring that all sections of the community, particularly the most vulnerable, have access to education, employment, health and public services is also to be commended. Whilst modal shifts to sustainable forms of transport are always to be encouraged and will benefit individuals and the wider population, we would recommend that attention is given to linking sites of employment and education to areas of high deprivation via the cycling and walking network. A focus on those more deprived communities should form part of the Core Strategy's objective to improve the quality of health of the residents of Hyndburn.	Further consideration required
678	Davina Helm Lancashire Constabulary Designing Out Crime Officers	General Comment	Vision	6	Propose additional wording to 'The Vision for Hyndburn': Hyndburn has grown in a sustainable way, with healthier residents, (safer communities) and is seen as a great place to settle.	Agree - make change
1022	Carole Woosey Environment Agency	General Comment	Vision	6	2. Vision, Aims and Objectives The vision refers to "environmental credentials" but does not directly refer to a healthy natural environment. We would welcome the inclusion of a statement that references the commitment to protecting and enhancing the natural environment.	Further consideration required
789	Ian Smith Historic England	Support	Vision	6	We support the proposed Vision especially the intention that by 2036 Hyndburn will be a distinctive part of Lancashire recognised for the collective quality and attractiveness of its market towns and its landscape setting.	Noted
710	Mohammed Ahmed Lancashire County Council (Environment Directorate)	General Comment	Strategic o	7	LCC recommend that the approach of targeting the benefits and opportunities of new investment and economic growth towards deprived neighbourhoods is included in Strategic Objective 1. We also recommend that as the DM DPD is reviewed, consideration is given to adopting a policy simliar to Lancaster's DM28: Employment Skills - this aims to target the benefits of new investment and economic growth towards the local community through employment and training opportunities.	Agree - make change  Make appropriate reference in SO1 of Core Strategy. The Council will not be reviewing the DM DPD for some time as it has only recently been adopted in January 2018.

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
683	Judith Douglas Judith Douglas Town Planning Limited	Support	Strategic o	8	Support Strategic Objective 2 and suggest this would be best achieved by including releasing greenfield sites for development beyond current settlement boundaries.	Noted
669	Andy McLaren Lichfields	Support	Strategic o	8	Taylor Wimpey strongly supports the aim of Strategic Objective 2, including through transformational change at Huncoat Garden Village. The council needs to do everything it can to boost the delivery of housing moving forward as it has previously under-delivered against its housing requirement set out in the Core Strategy 2012.	Noted
878	Daniel Owen RPS Consulting Services Ltd	General Comment	Strategic o	8	General support for Strategic objectives, particularly Strategic Objective 2 that seeks to provide for a greater choice and quality of housing and explicitly supports the transformational change at Huncoat Garden Village. However, supporting text makes no reference to Huncoat GV. Relationship of Strategic Objective 2 and HGV should be spelt out explicitly.	Agree - make change
1117	Joshua Hellawell PWA Planning	Object	Strategic o	8	The Council has a persistent record of under provision of new housing compared against the objectively assessed need. It is therefore imperative that housing designations are made and that green belt release is revisited. The Council does not have a 5 year supply of housing if measured against the housing target set in the Core Strategy of 216 dwellings per annum.	Noted
767	Joanne Harding The Home Builders Federation	Support	Strategic o	8	HBF supports recognition for a good choice of homes within Hyndburn and the role it can play in creating a sustainable, healthy and great place. Supports SO2 in looking to provide for a greater choice and quality of housing.	Noted
1205	Sport England	General Comment	Strategic o	8	Sport England support the strategic objectives but would like to see SO2 broadened to include the concept of 'active design'. Re-write 'To provide for a greater choice and quality of housing, designed and built to incorporate 'active design' to enable people to lead active lives, including through transformational change at the Huncoat Garden Village'. Sport England, in conjunction with Public Health England, have produced Active Design Guidance setting out 10 key design principles.	Agree - make change  Make reference in SO2 and relevant parts of the Core Strategy to Active Design and the Active Design Guidance.

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
709	Mohammed Ahmed Lancashire County Council (Environment Directorate)	General Comment	Strategic o	9	LCC recommend adopting the 10 Active Design principles under Strategic Objective 3: To improve the quality of health of the residents of Hyndburn, with a view to encouraging more physical activity for all in daily life. Active design principles can be applied within the following policy areas: Community Infrastructure; Housing; Environment (Natural & Built Environment); Environment (Design and Quality); Accessibility and Transport	Agree - make change Make reference to Active Design
670	Andy McLaren Lichfields	Support	Strategic o	9	Taylor Wimpey fully supports the aim of Strategic Objective 3 to improve the quality of health of residents and suggests the provision of better, high-quality housing can address this issue.	Noted
1206	Sport England	General Comment	Strategic o	9	Sport England support the strategic objectives but would like to see SO3 broadened to add reference to active Hyndburn residents. Suggested wording 'To improve and sustain the quality of health and enable the residents of Hyndburn to lead active lifestyles'. SO3 should not just be about providing new facilities but also include protecting, sustaining and improving those which the area already enjoys.	Agree - make change
631	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Support	Strategic o	9	Lancashire Wildlife Trust is pleased to see reference to the West Pennine Moors being designated as a nationally important Site of Special Scientific Interest (SSSI) in paragraph 2.19, and both Peel Park and Woodnook Vale being designated as locally important, but statutorily designated, Local Nature Reserves (LNR) in paragraphs 2.16 and 2.19. Hyndburn Council should be commended for being the first local authority in Lancashire not only to meet, but to exceed, the government guideline of 1 hectare of LNR for every 1,000 people in the borough.	Noted
1023	Carole Woosey Environment Agency	Not Stated	Strategic o	9	Suggest strengthening of Strategic Objective 4 to echo the "protected and enhanced" reference suggested for inclusion in the Aim (see Rep 1022). This objective should also reference being prepared for reducing the causes and effects of climate change. These additions would support the section in paragraph 20 of the NPPF, which states that; "conservation and enhancement of the environment" and "measures to address climate change and mitigation and adaption" be included in strategic policies. Suggested wording for Strategic Objective 4: "To create a valued urban and rural environment that is protected, enhanced and ready to face the causes and effects of climate change"	Further consideration required

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
790	Ian Smith Historic England	Object	Strategic o	9	<p>Whilst we support the thrust of this Objective, the role of the Plan is not only to 'create' a valued urban and rural environment, but should also be about ensuring that the Borough's existing environmental assets (which give its settlements and landscapes such a distinctive character) are safeguarded and, where appropriate enhanced, and that where new development does take place it does so in a manner which helps to reinforce the local character. Consequently, it might be more appropriate to emend the Strategic Objective to more clearly articulate its purpose.</p> <p>Suggest that Strategic objective 4 is amended to read: "To conserve and, where appropriate, enhance to Borough's distinctive urban and rural environment"</p>	<p>Agree - make change</p> <p>Amend SO4 wording or supporting text to reflect comments</p>
1063	Nigel Aubrey	Object	Strategic	10	<p>Strategic objective 5 (access to services and facilities): lack of reference in plan to impact of medical health or dental health on this. Reference to shortage of GP's/dentists and new doctors/dentist , waiting times - indicates that there will not be adequate GP &amp; dentists capacity in Rishton to serve new development.</p> <p>Also questions whether there is adequate primary and secondary school capacity.</p>	Further consideration required
1085	Kevin Parkinson	Object	Strategic	10	<p>Strategic objective 5 (access to services and facilities): lack of reference in plan to impact of medical health or dental health on this. Reference to shortage of GP's/dentists and new doctors/dentist , waiting times - indicates that there will not be adequate GP &amp; dentists capacity in Rishton to serve new development.</p> <p>Also questions whether there is adequate primary and secondary school capacity.</p>	Further consideration required
1052	Mary Aubrey	Object	Strategic	10	<p>Strategic objective 5 (access to services and facilities): lack of reference in plan to impact of medical health or dental health on this. Reference to shortage of GP's/dentists and new doctors/dentist , waiting times - indicates that there will not be adequate GP &amp; dentists capacity in Rishton to serve new development.</p> <p>Also questions whether there is adequate primary and secondary school capacity.</p>	Further consideration required

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
556	Jeff Scales	General Comment	Strategic	10	No reference to health and GP appointments tend to be major concern of residents	Noted  The Infrastructure Delivery Plan to accompany the Publication Local Plan will consider health infrastructure and access to GP surgeries
1074	Ian Smith Historic England	Object	Strategic	10	Strategic objective 5 (access to services and facilities): lack of reference in plan to impact of medical health or dental health on this. Reference to shortage of GP's/dentists and new doctors/dentist , waiting times - indicates that there will not be adequate GP & dentists capacity in Rishton to serve new development. Also questions whether there is adequate primary and secondary school capacity.	Further consideration required
555	Jeff Scales	General Comment	CS1	12	No mention of regeneration to existing housing stock and existing areas. Financial benefits of new development should be used to address these issues (e.g. strategic use of planning gain linked to provision of affordable housing)	Further consideration required  Consider strengthening policy. Para. 3 of Policy CS1 does refer to regeneration already. Affordable housing contributions proposed in Policy CS9 would relate to adopted DM DPD Policy DM12 and GN2 where paragraph 5.5 refers to gap funding or refurbishment of long term vacant properties as potential investment routes
855	Dan Ingram Barton Willmore	General Comment	CS1	12	The re-use of brownfield land is a reasonable move by the Council, however it should not prohibit other suitable sites coming forward elsewhere. The Council should recognise the crucial role that greenfield sites can play in maintaining an adequate supply of housing; they can often be delivered quicker than brownfield sites, and are less likely to require expensive remediation, meaning they are better placed to provide other benefits such as affordable housing and other planning obligations. The prioritisation of previously developed land should not compromise the delivery of housing to meet local needs; accordingly, it important that the Council allocates greenfield as well as brownfield sites to ensure that a robust supply of housing is provided and which meets the needs of residents in the event that brownfield sites are slower to deliver than anticipated (as can typically be the case).	Noted

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
861	Ann Schofield	Object	CS1	12	<p>Objection to General Development Strategy in relation to Huncoat on grounds summarised as:</p> <p>Unless you wish Huncoat to become a commuter village it cannot stand the size of development planned.</p> <p>Huncoat has the least facilities of all the other areas in the borough but is scheduled for the most development.</p> <p>It is already congested traffic wise with more than it's fair share of heavy goods vehicles from the industrial estates and the tip.</p> <p>There would need to be a new school as the present one and the surrounding cannot take any further development in relation to the school.</p>	<p>Further consideration required</p> <p>The final strategy and development quantum will be presented in the Publication Local Plan following completion of further evidence base work, the Huncoat Masterplan, and consideration of the findings of the Sustainability Appraisal</p>
1048	David Morris EC Squared (NW) Ltd	Support	CS1	12	support for identification of Rishton as a key growth point, but considers that growth should be directed at sustainable and deliverable sites close to existing facilities and transport links.	Noted
864	Helen Holland Blackburn with Darwen Borough Council	General Comment	CS1	12	The spatial development strategy set out in Hyndburn's draft Core Strategy is consistent with the approach contained in the existing local plans for Blackburn with Darwen, which is expected to be continued in the emerging local plan (Issues and Options Consultation has just concluded on 1st April).	Noted
1014	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	CS1	12	Long term brown field sites need careful consideration to ensure deliverability. Allocation of undeliverable brownfield sites over sustainable greenfield sites is contrary to NPPF.	Noted
632	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Support	CS1	12	Lancashire Wildlife Trust supports the inclusion of the natural environment in Policy CS1: The Spatial Development Strategy.	Noted
1056	Mary Aubrey	Support	CS1	12	Broad support for development of brownfield sites within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1013	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	CS1	12	detailed comments re Green Belt which is in need of review. Sufficient amendments should be considered to accommodate future plans, not limited to just safeguarded land and ensure longevity of Green Belt (NPPF para 139).	Noted
1045	David Morris EC Squared (NW) Ltd	Not Stated	CS1	12	Broad support for development strategy which seeks to provide 4320 homes but wording in CS1 should be more positive, replacing "sufficient" with "minimum of". Strategy should be ambitious and increasing supply would better reflect NPPF.	Further consideration required
1046	David Morris EC Squared (NW) Ltd	Not Stated	CS1	12	Proposed requirement is in excess of CLG figures and as per HENA study but below medium growth option set out in previous consultation. Encourages uplift to previous medium growth option figure.	Further consideration required
1047	David Morris EC Squared (NW) Ltd	Not Stated	CS1	12	Concerns over priority given to redevelopment of brownfield sites; this should not prevent other suitable sites coming forward. Role of greenfield sites should be recognised in maintaining supply, delivering housing and meeting identified needs and other associated benefits. Brownfield sites are often slower to deliver.	Further consideration required
1015	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	CS1	12	Flexibility of plans is key. Housing trajectory is not yet drafted; care needed to ensure this will not delay or prejudice delivery of sustainable development over the plan period.	Noted
1207	Sport England	General Comment	CS1	12	SE generally supports the development strategy but would like to see active design supported and promoted. Suggests including reference in the Core Strategy to several different policies of relevance or a separate policy solely for active design. A model policy is contained on p53 of the Active Design Guidance published by Sport England and Public Health England.	Further consideration required
1094	Christopher McGough McGough Planning Consultants Ltd	Support	CS1	12	It is important that planning policy encourages development first on previously developed land within Accrington before land in smaller settlements or green field land. With the clear exception of Huncoat Garden Village, Ribston considers the policy as set out achieves this aim. Any revisions to this policy that the Council seeks to bring forward should not weaken the its locational aims.	Noted

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1102	Amy James Indigo Planning	Not Stated	CS1	12	Green Belt: Support the need for review of Green Belt boundaries. Action of Council in acknowledging that boundaries are tightly drawn and desire to meet future development requirements in full, even if this results in changes to the Green Belt boundaries represents a positively prepared approach to planning.	Noted
787	Derek Glover	General Comment	CS1	12	Preservation of Green Belt areas are of prime importance in the urban townships. Priority should be given to development of urban areas requiring demolition / rebuilding / reuse and / or conversion	Noted
764	Dan Ingram Barton Willmore	General Comment	CS1	12	Client considers wording of CS1 strategy could be altered to present a more positive outlook, replacing the use of the word 'sufficient' with a 'minimum of'. The housing strategy should be ambitious seeking to deliver in excess of the minimum requirement as the market dictates.	Further consideration required
1157	Adam Brennan United Utilities	Not Stated	CS1	12	Comments to highlight that disproportionate growth in small settlements can place strain on existing water and wastewater infrastructure. Impacts will be more fully understood when more information becomes available about specific sites. Additional wording is recommended to ensure (1) delivery of development is guided by strategies for infrastructure to ensure co-ordination; and (2) the plan supports investment in infrastructure	Further consideration required Consider whether to include additional wording
1118	Joshua Hellowell PWA Planning	General Comment	CS1	12	Paragraph 3 of CS1 infers that sufficient land will be made available in the Borough to meet identified needs - the Council is currently unable to do this. Policy restrictions such as Green Belt ought to be revisited, the council presently has insufficient evidence to provide reassurance that the dwelling target can be met. Site 57 'land north of Blackburn Road Oswaldtwistle' can provide a large strategic designation. The need for green belt release is clear and the Council should make large strategic allocations as the most efficient way of promoting development, permitting a range of house-types to be delivered.	Further consideration required
689	Warren Hilton Highways England	General Comment	CS1	12	Highways England would welcome the opportunity to work with Hyndburn BC to fully understand the potential cumulative impact of development on the M65 motorway, especially considering multiple sites proposed around and the approaches to M65 Junction 6 at Whitebirk. This is required to be able to identify appropriate and deliverable mitigation measures to offset the impacts of proposed growth on the safe and efficient operation of the SRN. These, along with sustainable transport measures should be included within the IDP referenced in para 7 of CS1.	Noted Further consultation to take place with Highways England and further evidence on Transport matters to be undertaken prior to Publication of the Local Plan in 2020

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
879	Daniel Owen RPS Consulting Services Ltd	Support	CS1	12	<p>Support for overall Development Strategy for the Local Plan and designation of Huncoat Housing Zone which justifies higher proportion of housing delivery in Huncoat than current Core Strategy. Particular parts of policy supported:</p> <p>1)- Inclusion of Huncoat in the highest tier of settlement hierarchy;</p> <p>3) Priority to devellping brownfield land in urban areas in relation to development of former Huncoat Power station (incl. railway sidings and former landfill) as a priority regardless of potential designation of HGV;</p> <p>4) intention to amend Green Belt boundary to support strategic growth, need to ensure exceptional circumstances;</p> <p>5) development of strategic housing site at Huncoat. Former Huncoat Power station site should be allocated and developed in advance of Green Belt land.</p> <p>If Green Belt Land is needed a phased approach should be adopted to ensure previously developed land such as former Huncoat Power Station which is not in Green Belt, is developed first.</p>	Noted
1024	Carole Woosey Environment Agency	Not Stated	CS1	12	<p>The sustainable approach and reference to protection and enhancement of environmental assets, alongside the commitment to prioritising brownfield sites, subject to remediation, are positive elements of this policy. Policy CS1 should make reference to new developments being expected to provide “environmental net gain”. Policy CS15 references net gain and its inclusion in CS1 would reinforce this policy so that developers are clear that they have an obligation to deliver measurable environmental improvements as part of any new scheme.</p>	Further consideration required
684	Judith Douglas Judith Douglas Town Planning Limited	Support	CS1	12	<p>Supports inclusion of Great Harwood as a 'Key Town' set out in Policy CS1. Support amendments to the Green Belt boundary to accommodate strategic allocations and to ensure that future employment and housing land requirements are met in full (including Green Belt release around Great Harwood). Acknowledges the strategic change since 2012 to include a strategic housing site at Huncoat, however we have concerns regarding the timing and delivery of the Huncoat Garden Village. Flexibility and a choice of sites in other parts of the Borough should be provided to enable other sites to come forward should Huncoat not deliver the 'significantly faster rate' of delivery aspired to.</p>	Noted

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1101	Amy James Indigo Planning	Not Stated	CS1	12	Do not support a sequential approach requiring all brownfield sites to come forward ahead of greenfield sites. This would not be consistent with NPPF which has requirements including; guiding development to sustainable locations and ensuring a five year supply of deliverable sites. There is no specific requirement that all these should be brownfield.	Further consideration required
1100	Amy James Indigo Planning	Not Stated	CS1	12	Do not support CS1 2) in relation to rural areas. It is a blanket policy and not consistent with NPPF. Instead proposals should respond to local needs. Policy should be flexible to allow for sites outside the urban boundary such as site 202 Cottams Farm, to contribute to housing delivery, especially when boroughs seeking a growth agenda.	Further consideration required
1099	Amy James Indigo Planning	Not Stated	CS1	12	There is support in principle for the identification of Clayton-le-Moor as a Principal Town in the proposed settlement hierarchy.	Noted
832	Warren Hilton Highways England	General Comment	CS1	12	Highways England recommends that a detailed and robust traffic modelling of M65 Junction 6 is undertaken by the Council to both test the impacts of the proposed site allocations in the vicinity of the junction (i.e. sites 106, 169, 88, 105, 228, 229 and 230) and identify/consider traffic mitigation requirements before formulating the Publication version Local Plan. The results of this work should be agreed with Highways England before the Plan is advanced any further, and we would be happy to support the Council with this work.	Further consideration required  Consultation with Highways England on scope and process for completion of this work
671	Andy McLaren Lichfields	General Comment	CS1	12	Taylor Wimpey supports the development of a new Spatial Development Strategy, however suggest prioritisation of brownfield land should not compromise delivery of housing as it can be subject to a variety of constraints and therefore the council should seek sites that are viable and deliverable. Also support the acknowledgement that some release of the Green Belt is needed to meet development needs. The Council will need to provide robust evidence at Publication stage on inclusion of settlements within the hierarchy, and 'exceptional circumstances' for any green belt release.	Noted  The Council will only proceed to allocate sites where evidence is available to confirm they are suitable, available and achievable in line with NPPF

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
768	Joanne Harding The Home Builders Federation	General Comment	CS1	13	HBF consider part 3 could take a more positive tone rather than providing 'sufficient' land, amendment that looks to 'increase the supply of land within the Borough..'. This would better reflect the NPPF requirement to plan positively and to boost significantly the supply of housing. HBF also has concerns over reference to 'prioritise' brownfield land. NPPF para 117 refers to 'promoting' not 'prioritising' brownfield. Suggest replacing 'priority' with 'support'.	Further consideration required
712	Mohammed Ahmed Lancashire County Council (Environment Directorate)	Support	CS1	13	Support the intention to focus investment and improvement in key regeneration areas, and returning long term vacant properties back into use. LCC recommend that as vacant properties are renovated the issue of adaptation for older residents is also considered and promoted where appropriate.	Further consideration required
791	Ian Smith Historic England	Support	CS1	13	We Support the intention that priority will be given to returning long-term vacant properties back into use. Despite the number which were demolished in the 20th and beginning of the 21st centuries, the surviving mills from the period when Hyndburn was one of the country's major centres of textile production, are one of the defining features of the Borough's settlements. Work undertaken by Historic England showed that there were some 50 surviving mills in the Borough. Of this total, 6 were vacant and a further 10 only partially occupied or underused. Of the total estimated amount of floor space, some 61,000 square metres appears to be in vacant or under-used premises, equating to approximately 23% of the total floor space in mills across the Plan area.	Noted
757	Tim Bettany-Simmons Canal and River Trust	General Comment	CS1	14	Criteria 6 of this policy relates to protecting and enhancing green infrastructure, suggest this should be expanded to include the wider definition of green/blue infrastructure to better reflect the multi-faceted nature of waterway/canal corridors.	Agree - make change
792	Ian Smith Historic England	Support	CS1	14	Subject to the change set out below, we support the requirement that existing environmental assets will be protected and enhanced and that new development will be expected to contribute to the local character and distinctiveness of the area. This will help to deliver the Strategic Objective 4	Further consideration required

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
793	Ian Smith Historic England	Object	CS1	14	NPPF Paragraph 8(c) identifies the environmental objective of sustainable development as 'contributing to protecting and enhancing our natural, built and historic environment'. In terms of the Strategic Policies which every Local Plan has to have, Paragraph 20 sets out a requirement for a Strategic Policy for the 'conservation and enhancement of the 'natural, built and historic environment'. For consistency, the Core Strategy should use the same terminology as national policy guidance. The final line should be amended to read, "... distinctiveness of the natural, built and historic environment in which it is situated"	Agree - make change
794	Ian Smith Historic England	Object	CS1	14	'Existing environmental assets' ought to encompass more than simply the Green Infrastructure network. In line with NPPF Paragraph 8(c), it must include the Borough's natural, built and historic environmental assets as well. Amend accordingly.	Agree - make change
672	Andy McLaren Lichfields	Support	CS2	18	Support for Policy CS2 however the council may be over-relying on the Huncoat Garden Village to meet identified housing need within the borough and suggest a greater quantum of housing should be identified in alternative sustainable locations. If a more conservative delivery estimate at Huncoat is employed then if issues affecting delivery were to arise then sufficient sites elsewhere in the Borough would still be available to ensure housing delivery not adversely impacted.	Further consideration required  The Council will be seeking to provide a range of site types and sizes around the Borough to ensure the plan is flexible in line with the requirements of NPPF. Final contribution of Huncoat to be confirmed at Publication stage.
690	Warren Hilton Highways England	General Comment	CS2	18	Highways England is aware that work is ongoing on the Huncoat Masterplan and would welcome further engagement and early sight of findings in terms of the potential transport impacts of proposed growth at proposed Huncoat Garden Village before this Local Plan is progressed to the next stage.	Noted  Further engagement to take place with Highways England in relation to the Huncoat masterplan and Publication version Local Plan. Further evidence base work on Transport also still to be undertaken

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
909	Adam Brennan United Utilities	Not Stated	CS2	18	<p>Huncoat Garden Village – Policy CS2</p> <p>Full detail of the development proposals are not yet known e.g. drainage proposals and water supply requirements. Impact on UU infrastructure over a number of 5 year investment periods cannot be assessed. As more detail becomes available, it may be necessary to co-ordinate the timing for the delivery of development with the timing for delivery of infrastructure. This development proposal is part of numerous site allocation and it will be necessary to demonstrate how the site delivers foul and surface water drainage as part of a site-wide strategy having regard to interconnecting phases of development. Whilst this will be addressed through additional masterplanning sessions, additions to Policy CS2 are recommended:</p> <p>"New development will be expected provide evidence of early dialogue between developers and infrastructure providers to identify infrastructure needs arising from new development and ensuring that these are addressed through building design, utility networks and connections in time to serve the proposed development. This must include evidence of how the development is to be delivered as part of interconnecting phases, demonstrating linkages in accordance with the masterplan and providing evidence of unfettered access between adjoining parcels to prevent a piecemeal approach to infrastructure.</p> <p>Once more details are known on development sites, for example, the approach to surface water management and proposed connection points to the sewer and clean water network, it may be necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements."</p>	<p>Further consideration required</p> <p>The Council and its masterplanning consultants will continue to engage with UU to resolve concerns and ensure relevant infrastructure considerations are taken into account</p>
907	Carole Woosey Environment Agency	Not Stated	CS2	18	<p>The plan makes reference to "garden village principles" and elaboration is needed on how the GV will differ from many other housing development and how it will contribute to the Council's sustainable approach and bring wider benefits.</p> <p>Reference to improving, green, blue and grey infrastructure is positive. However there is no reference in the policy regarding the phasing of the infrastructure for the development. Inclusion of timescales as a means of control will reinforce the expectation on developers to contribute towards the delivery of infrastructure. It would be beneficial to have that commitment and obligation for developers captured in the policy to avoid a piecemeal approach.</p>	Further consideration required

**Representations made to the Core Strategy Review consultation draft**

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
765	Dan Ingram Barton Willmore	General Comment	CS2	18	Concern about production of a Design Code SPD for the Huncoat Garden Village about how long the document will take to produce and the implication that any delays could have on the housing delivery. The Garden Village is a key aspiration and a major part of the development strategy. The Design Code should be produced alongside the CSR rather than after it. Our Client's land interests (Higher Gate Road, Huncoat) could be delivered in isolation and should not be restricted in coming forward in the event a Design Code SPD is delayed post-adoption of the Core Strategy.	Further consideration required
881	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS2	18	Concerned that wording of third bullet point in relation to delivery of infrastructure is vague. Detailed concerns set out in relation to reference to use of legal agreements and intention to use equalisation agreements. Greater clarity needed on use of legal agreements and infrastructure requirements. Policy should allow for consideration of viability and caveat for if agreement cannot be reached on equalisation agreements. Support amendments to Green Belt boundary to facilitate HGV and looks forward to Council demonstrating necessary exceptional circumstances. Supports reference (para. 20-21) to landowners making fair contribution to new infrastructure but there is a lack of clarity and detail over how this will be calculated. Concern that there is a reliance on landowners to reach agreement and Council should take a lead on this. Delay should not be caused to development on previously developed sites.	Further consideration required

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
795	Ian Smith Historic England	Object	CS2	18	<p>The Grade II Listed Huncoat War Memorial lies in the Recreation Ground to the south-west of this site. The loss of this currently-undeveloped area to its east and its subsequent development could harm elements which contribute to the setting of this memorial. Paragraph 185 of the NPPF sets out a requirement for Local Plans to conserve heritage assets in a manner appropriate to their significance. When considering the impact of a proposed development upon the significance of a designated heritage asset, Paragraph 193 of the NPPF makes it clear that great weight should be given to the asset's conservation and explains that significance can be harmed by development within its setting.</p> <p>In order to demonstrate that the allocation of this area is not incompatible with the requirements of the NPPF, as part of the Stage 3 Detailed Appraisal there needs to be an assessment of what contribution this currently-undeveloped area makes to those elements which contribute to the significance of this Listed Building and what effect the loss of this site and its subsequent development might have upon its significance.</p> <p>In addition, there is a requirement in the 1990 Act that "special regard" should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is submitted, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving a Listed Building or its setting may mean that either, the site cannot actually be developed or the anticipated quantum of development is undeliverable.</p> <p>Suggested changes: As part of the Stage 3 Detailed Appraisal:-</p> <p>(a) An assessment needs to be undertaken of the contribution which these sites makes to those elements which contribute towards the significance of this Listed Building and what impact their loss and subsequent development might have upon its significance.</p> <p>(b) If it is considered that the development of these areas would harm elements which contribute to the significance of this Listed Building, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(c) If, at the end of the process, it is concluded that the development</p>	Noted

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
					would still be likely to harm elements which contribute to the significance of this Listed Building, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).	
865	Helen Holland Blackburn with Darwen Borough Council	General Comment	CS2	18	<p>Blackburn with Darwen Council recognises the importance of the proposals at Huncoat within the overall spatial strategy for Hyndburn's emerging Core Strategy. It is noted that the draft Core Strategy describes the proposals for Huncoat in the following manner:</p> <p>"...garden village would be of significance not just to Hyndburn but also to the wider Pennine Lancashire sub-region, due to its strategic location on both the road and rail networks."</p> <p>There are already close working relationships between the two authorities under the duty to cooperate including the recently published joint evidence base (Housing and Economic Needs Assessment – HENA study). Dialogue will continue between the two authorities to ensure that development proposals both within Blackburn with Darwen and Hyndburn, including Huncoat, will deliver complementary growth for the two authorities.</p>	Noted
862	Ann Schofield	Object	CS2	18	<p>Objection to General Development Strategy in relation to Huncoat on grounds summarised as:</p> <p>Unless you wish Huncoat to become a commuter village it cannot stand the size of development planned. Huncoat has the least facilities of all the other areas in the borough but is scheduled for the most development. It is already congested traffic wise with more than it's fair share of heavy goods vehicles from the industrial estates and the tip. There would need to be a new school as the present one and the surrounding cannot take any further development in relation to the school.</p>	<p>Further consideration required</p> <p>Points raised will be considered in part through the Masterplanning process underway, but also as part of preparing the Publication version of the Local Plan for Regulation 19 consultation in 2020.</p>
856	Dan Ingram Barton Willmore	Support	CS2	18	<p>We are supportive of the Council's proposals for Huncoat Garden Village, and the provision of between 1,000 and 2,000 new homes to be integrated into the existing settlement. However, the emerging Local Plan would benefit from a diagram demonstrating the precise extent of the allocation (and location of the Garden Village) in order to provide greater certainty moving forward.</p>	Agree - make change

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
904	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	CS2	18	Detailed comments on policy CS2 Huncoat Garden Village. Main points: - timescales for the delivery of full garden village beyond plan period should be made clear. - needs a realistic view of delivery and evidence for delivery rates and explanation of why formal recognition of GV impacts on delivery. - Detailed queries arising from reference to "design review" in para. 3.32	Further consideration required
880	Daniel Owen RPS Consulting Services Ltd	Support	CS2	18	Fully Supports identification of Huncoat Garden Village as strategic Location for growth and inclusion of former Hucoat Power station in the designation. General support for range of housing to be delivered but consider it likely that housing at the upper end of range will need to be delivered to support delivery of necessary infrastructure.	Noted
882	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS3	24	Comments relate to third bullet point and release of Green Belt: It is not clear why the Green Belt boundary would not be amended to allow for both the delivery of HGV and the expansion of the strategic employment hubs.	Agree - make change  Approach to be clarified at Publication stage with firmer plans on strategic sites known then
691	Warren Hilton Highways England	General Comment	CS3	24	Highways England has concerns relating to the number of sites being proposed for development around and on the approaches to the M65 J6, as well as the potential addition of sites to the north and south of J7. No transport evidence has yet been prepared to support the emerging Local Plan. PPG states that an assessment of transport implications should be undertaken at several stages of the plan, it should be an iterative evidence base process ultimately shaping the development rather than being collected retrospectively, and then trying to retrofit it to the development strategy.	Noted  Further consultation to take place with Highways England and further evidence on Transport matters to be undertaken prior to Publication of the Local Plan in 2020. To date transport evidence relates to 'access' issues only due to the large number of site options still being considered. 'Capacity' issues are to be addressed through forthcoming evidence work which will focus on a more limited number of site options.

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
866	Helen Holland Blackburn with Darwen Borough Council	General Comment	CS3	24	Blackburn with Darwen Council notes the proposals for the provision for around 68 hectares of land to be provided for economic development purposes. This consists of the 58 hectares identified in the HENA study plus an additional 10 hectares to account for employment land losses set out in the previous employment land study undertaken for Hyndburn. There are already close working relationships between the two authorities under the duty to cooperate including the recently published joint evidence base (Housing and Economic Needs Assessment – HENA study). Dialogue will continue between the two authorities to ensure that development proposals both within Blackburn with Darwen and Hyndburn, including for employment development, will deliver complementary growth for the two authorities.	Noted
653	Paul Worswick	Object	CS3	24	Support for retention of Junction 7 as a strategic employment site but objection to the possibility of expansion and to the phrase; 'land is available...north and south of Junction 7 of the M65 (Clayton-le-Moors)' and would therefore object to any development as further narrows the Green Belt.	Further consideration required Take into account in considering preferred sites for allocation and preparing Publication Local Plan
905	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	CS3	26	Not clear if the statement in relation to Green Belt relates specifically to employment uses rather than other purposes which would contradict statements elsewhere in the document. This should be made clear.	Agree - make change
747	Judith Horgan Stephen Ward Town Planning & Development Consultants Ltd	Support	CS4	26	Angelo Beef Processors welcome the flexibility allowed by this policy provision.	Noted
1095	Christopher McGough McGough Planning Consultants Ltd	Support	CS4	26	Client's site at Broad Oak is currently in operational use delivering quality manufactured products. The buildings are suited to the existing tenant, but if they become vacant, they are unlikely to be attractive to other commercial tenants. In that scenario, planning policy should be flexible enough to allow planning application for alternative uses to succeed.  Considers policy CS4 achieves the right balance and supports the policy as set out and also express stong support for the tests set out in paragraphs 3a, b & c, and paragraphs 4,5 & 6.	Noted

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1096	Christopher McGough McGough Planning Consultants Ltd	General Comment	CS4	26	Support for the broad thrust of this policy insofar as it would allow housing development on the Broad Oak site in the event that continued employment use became unviable.	Noted
742	Nick Pleasant NJL Consulting	General Comment	CS5	29	Believe an alternative approach to considering such uses at The Peel Centre whereby a more measured approach to dealing with existing units and minor additional floorspace/uses is adopted. Preference would be for the policy to note that future retailing can be suitable at The Peel Centre.e.g. a threshold-based approach whereby only 'new build' space in excess of a threshold (of 2,500sqm) would be 'tested' under town centre use policy. Therefore more limited development, reconfigurations and specified changes of use do not need to be supported by sequential and impact assessments. This would align with emerging policy CS32, DM3, NPPF and PPG recognising that retail and leisure development can require particular locations in order to serve specific and locationally driven demand.	Further consideration required  Any amendments to be consistent with the policy approach on retail impact thresholds set out in recently adopted DM DPD Policy DM3
741	Nick Pleasant NJL Consulting	Support	CS5	29	Support broad direction of travel of Policy CS5: Centre Hierarchy, Strategy and Retail Provision and welcome recognition that The Peel Centre is in the retail hierarchy and can perform a mixed and varied retail and leisure role.	Noted
646	Robert Barnes Planning Prospects Ltd	Object	CS5	29	Proposes additional text to be added to Policy CS5: Centre Hierarchy, Strategy and Retail Provision, clarifying the relationship of Policy CS1 (Spatial Development Strategy) and the aims of the retail hierarchy set out in CS5 - specific wording recommended.	Further consideration required
867	Helen Holland Blackburn with Darwen Borough Council	General Comment	CS5	29	Blackburn with Darwen Council notes the intentions for the two sites at the Peel Centre and Oswaldtwistle Mills and the further information with respect to the Peel Centre within the area policies for Knuzden and Whitebirk. The general policy approach for these two sites is noted particularly the recognition that any further development needs to be ancillary uses to support the existing retailing and planned employment uses at the Peel Centre and at Frontier Park.	Noted

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1208	Sport England	General Comment	CS6	34	SE welcome this policy however there should be reference to the Council's Playing Pitch Strategy as relevant evidence. Policy should also be re-worded to reference NPPF requirements on playing fields more clearly (set out in paragraph 97). Finally it should recognise the role of sport in contributing to a wide range of spatial planning issues: regeneration, health promotion, crime reduction, quality of life, engaging with colleagues in sports development, education and public health.	Agree - make change
1158	Adam Brennan United Utilities	Support	CS6	34	General support for policies which focus on delivering high quality landscaping and green infrastructure and emphasises the multifunctional benefits of sustainable drainage systems/green infrastructure . Recommend that additional wording is included in the policy to require inclusion of multi functional green infrastructure where applicable.	Further consideration required Consider suggested additional wording
758	Tim Bettany-Simmons Canal and River Trust	General Comment	CS6	34	The Trust considers that our waterways should be specially mentioned within the supporting text to the policy as important open space. These spaces can provide areas for social interaction, and can enable and support healthy lifestyles through providing access for walking, cycling and waterbourne sports. However it should be noted that the Trust would not support the canal network being designated as Local Green Space.	Agree - make change
1087	Kevin Parkinson	Object	CS6	34	There needs to be improved regulation in relation to the management scheme arrangements set up by developers for the safeguard of residents, particularly before they purchase the properties.	Further consideration required The Council will consider the policy around future management and maintenance of private open space further before the Publication plan is released in 2020
1064	Nigel Aubrey	Object	CS6	34	There needs to be improved regulation in relation to the management scheme arrangements set up by developers for the safeguard of residents, particularly before they purchase the properties.	Further consideration required The Council will consider the policy around future management and maintenance of private open space further before the Publication plan is released in 2020

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1195	Angela Leigh Natural England	General Comment	CS6	34	The plan should avoid building on open space of public value as outlined in para 97 of the NPPF. It should also make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in para 96 of the NPPF. Natural Englands ANGSt may be of use in assessing current levels of accessible space and planning improved provision.	Noted  The Council is conducting an Open Space Audit now and is integrating ANGSt into the work
796	Ian Smith Historic England	Support	CS6	34	We support Criterion 1(b) which will help to safeguard the open spaces in the Borough. Many of these areas either contribute to the character of the Borough's Conservation Areas or to the setting of the heritage assets around them.  We also support the intention to identify Local Green Spaces. One of the examples given in NPPF Paragraph 100(b) for area which might warrant Local Green Space designation are where sites hold a particular local significance because of their historic significance. This Policy will, therefore, also assist in helping to conserve the significance of many of the Borough's heritage assets.	Noted
1053	Mary Aubrey	Object	CS6	34	There needs to be improved regulation in relation to the management scheme arrangements set up by developers for the safeguard of residents, particularly before they purchase the properties.	Further consideration required  The Council will consider the policy around future management and maintenance of private open space further before the Publication plan is released in 2020
1075	E Neville	Object	CS6	34	There needs to be improved regulation in relation to the management scheme arrangements set up by developers for the safeguard of residents, particularly before they purchase the properties.	Further consideration required  The Council will consider the policy around future management and maintenance of private open space further before the Publication plan is released in 2020
557	Jeff Scales	General Comment	CS6	34	Needs better safeguarding and regulation of Open Space and Local Green Space in relation to the management schemes set up by developers.	Agree - make change  Provide further detail or guidance

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1209	Sport England	General Comment	CS7	36	Policy seems weak at protecting existing facilities. It should be reworded in line with both SE Playing Fields Policy and para 97 of the NPPF. Positive approach to provision and enhancement required, and clear policy on protection from loss and criteria to be considered. Policy should also reference the Council's Playing Pitch Strategy and Built Sports Facilities Strategy.	Further consideration required  Consider whether DM DPD provides sufficient framework or not.
1103	Amy James Indigo Planning	Not Stated	CS8	37	Planning policies for planning obligations should meet tests set out in NPPF. CS should also allow for viability to be taken into account to enable developments to come forward.	Further consideration required
1210	Sport England	General Comment	CS8	37	SE welcomes inclusion of a policy to secure development contributions, the policy should set out expectations associated with sport and recreation to be included in new development as well as those to be provided through S106. Reference to Playing Pitch Strategy and Built Sports Facilities Strategy may be relevant here.	Further consideration required
883	Daniel Owen RPS Consulting Services Ltd	General Comment	CS8	37	Para 1 of CS8 refers to 'reasonable' costs of new infrastructure: the wording is similar to NPPF para. 56 however policy would be clearer if it directly quoted the three tests taken from CIL regulations. The policy should also include additional wording to reflect para 57 of NPPF. Lack of clarity over approach to delivery of infrastructure and planning obligations in relation to Huncoat Garden Village as set out in response to CS2 (rep 881).	Further consideration required
1025	Carole Woosey Environment Agency	Not Stated	CS8	37	The identification of infrastructure requirements in site allocations with a specific obligation for delivery by developers is a welcome addition in this policy. The infrastructure plan should be regularly updated as new information becomes available to account for any changes in circumstances. We would welcome the opportunity for ourselves and other stakeholders to engage early with infrastructure plan changes. Early engagement with stakeholders will allow them to identify infrastructure schemes that may be eligible for, developer contributions to support their delivery.	Noted
906	Rachael Graham Persimmon Homes (Lancashire)	Not Stated		39	Bullet point at Strategic objective 2 refers to "making the best use of brownfield land ...". Should be amended to reflect NPPF para's 122 & 123 which do not relate solely to previously developed land.	Further consideration required

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
854	Dan Ingram Barton Willmore	General Comment	CS9	40	Housing provision of 216 dwellings per annum is below the 'medium' growth option set out in the previous Local Plan consultation which was identified as being the most sustainable option moving forward. We would therefore encourage the Council to uplift the housing requirement to align with the previous 'medium' growth option (246	Further consideration required  The revised housing figure of 216dpa relates to the more recent evidence base prepared in the HENA study.
783	Andy McLaren Lichfields	Object	CS9	40	Affordable housing requirement should be based on robust and sound evidence. The viability study of 2016 is considered out of date and should be updated. There is no stipulation in Policy CS9 which allows for flexibility with the requirement where viability is marginal.	Further consideration required
784	Andy McLaren Lichfields	General Comment	CS9	40	No clarification is provided on whether the figures of 30dph and 40dph density set out in the policy are net or gross figures. If the figures are gross, Taylor Wimpey consider these to be too high and should be reconsidered. If the figures are net then they are considered appropriate to pursue in the stated locations.	Further consideration required
1119	Joshua Hellowell PWA Planning	General Comment	CS9	40	The adoption of the 'medium growth' strategy for housing places the Council in a position where a number of sizeable designations will be required. Deliverability of all sites must be assessed in detail particularly those in urban areas. It would seem prudent to have regard to the benefit of making larger allocations.	Noted
1106	Amy James Indigo Planning	Not Stated	CS9	40	Support for recognition that affordable housing will only be sought where viable. Policy should be expanded to allow for off-site provision of affordable housing/ in lieu contributions as per NPPF para. 62.	Further consideration required
797	Ian Smith Historic England	Object	CS9	40	Whilst NPPF Paragraph 117 sets out a requirement that plans should promote the effective use of land, in achieving appropriate densities, Paragraph 122 (d) makes it clear that account has to be taken of the desirability of maintaining an area's prevailing character. There may, in addition, be other places where the need to conserve a heritage asset may warrant a lower density than is set out in this Criterion. Therefore, this Policy should include a provision that these densities may be varied where this is necessary either to maintain the character of the local area or safeguard the setting of a heritage asset. Suggest that policy CS9, Criterion 4, line 3 is amended to read:- ". .. per hectare elsewhere. Exceptions may be made where this is necessary either to maintain the character of the local area or to safeguard the setting of a heritage asset"	Further consideration required

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
868	Helen Holland Blackburn with Darwen Borough Council	Support	CS9	40	Blackburn with Darwen Council support the approach to housing provision as it is consistent with the joint evidence base set out in the HENA study (jointly commissioned by Blackburn with Darwen and Hyndburn).	Noted
889	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS9	40	Supports setting out of densities in Site Allocations DPD as there is a potential conflict between densities of 30 to 40 dph and the Garden Village Principles set out for the HGV	Noted
857	Joanne Harding The Home Builders Federation	Support	CS9	40	HBF supports paragraph 2 of CS9 which seeks to maintain a rolling 5 year supply of specific, deliverable sites throughout the plan period.	Noted
858	Joanne Harding The Home Builders Federation	Object	CS9	40	Reference 'to maximise the opportunities for the delivery of affordable housing' is an aspiration rather than a policy and could be interpreted more onerously than the remainder of paragraph 3. Reference to viability should be retained but included in the requirements set out in the second sentence. Amend policy to ensure that requirements are viable and homes will be delivered.	Further consideration required
859	Joanne Harding The Home Builders Federation	General Comment	CS9	40	HBF supports efficient use of land and need for density policy. Policy could be more flexible though, taking into account local characteristics, market aspirations and viability in determining an appropriate density. Add the following text: 'densities below those set out above may be considered appropriate where local variations in housing need, local characteristics, site-specific circumstances or scheme viability indicate a different density is required in order to achieve local plan objectives'.	Further consideration required
1104	Amy James Indigo Planning	Support	CS9	40	Support for: acknowledgment that housing targets are considered a minimum; a figure above CLG methodology requirement to support growth; the need to develop high quality family homes and a good range of housing for workers.	Noted
1105	Amy James Indigo Planning	Not Stated	CS9	40	Question whether the housing figure should be higher to reverse trends of out migration and provide greater opportunity for meeting affordable housing needs.	Further consideration required

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
685	Judith Douglas Judith Douglas Town Planning Limited	Support	CS9	40	Supports the councils proposed housing figures of at least 4320 dwellings. Huncoat Garden Village contribution should be considered carefully since there are current uncertainties around levels and rates of provision. Suggests that consideration will need to be given to allocating sites in areas where development is more viable (i.e. not affected by low house values) to ensure aspiration of affordable homes provision is met.	Further consideration required
719	Stuart Booth JWPC Ltd	Object	CS9	40	Minimum density of 30 dwellings per hectare may in some instances be undeliverable or not provide the quality of design or size of homes sought. Needs flexibility in the policy to allow developments of less than 30 in appropriate circumstances.	Further consideration required  Policy approach to density to be reviewed in light of changes to Planning Practice Guidance and
1037	Stuart Booth JWPC Ltd	Object	CS9	40	Minimum density of 30 dwellings per hectare may in some instances be undeliverable or not provide the quality of design or size of homes sought. Needs to be flexibility in the policy to allow developments of less than 30 in appropriate circumstances.	Further consideration required
1017	Rachael Graham Persimmon Homes (Lancashire)	General Comment	CS9	40	In order to comply with requirements of NPPF regarding flexibility, plans should not be over reliant on strategic allocations or be overly prescriptive. A balance needs to be struck recognising role of market in delivering new homes.	Noted
1016	Rachael Graham Persimmon Homes (Lancashire)	General Comment	CS9	40	It should be made clear whether density requirements relate to net or gross site areas	Further consideration required
1041	Stuart Booth JWPC Ltd	Object	CS9	40	Minimum density of 30 dwellings per hectare may in some instances be undeliverable or not provide the quality of design or size of homes sought. Needs to be flexibility in the policy to allow developments of less than 30 in appropriate circumstances.	Further consideration required
673	Andy McLaren Lichfields	Support	CS9	40	Taylor Wimpey supports level of housing provision identified within Policy CS9, noted this represents a consideration excess in relation to the identified Local Housing Need (LHN) figure.	Noted

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
782	Andy McLaren Lichfields	Support	CS9	40		Noted
769	Joanne Harding The Home Builders Federation	General Comment	CS9	40	HBF note the housing requirement of 216dpa taken from the HENA study is below the medium housing growth option set out previously, it is therefore considered that there may be scope for an increase in the housing requirement.	Further consideration required
785	Andy McLaren Lichfields	Support	CS9	40	Support intention to review the requirement for self-build over the plan period if demand increases. Would not advocate a requirement on large strategic sites due to uncertainty around size and layout of plots.	Noted
888	Daniel Owen RPS Consulting Services Ltd	Support	CS9	40	fully supports alternative approach to calculation of housing requirement and that this is in excess of the number calculated through the Standard Method. The Council will need to ensure that this is fully evidenced and linked to the exceptional circumstances for amending the GB boundary.	Noted
887	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS9	40	considers that the wording of Paragraph 6.7 essentially waters down the objective of the NPPF by not making reference to 'significantly boosting' the supply of housing and recommend rewording as follows: "The NPPF seeks to ensure that a sufficient amount and variety of land can come forward in order to support the Government's objective of significantly boosting the supply of new homes. Paragraph 60 states....."	Agree - make change
886	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS9	40	part 3) Supports the provision of affordable housing as a percentage of market housing. Council will need to demonstrate this is viable when considered against other requirements that have potential to impact on viability	Noted
885	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS9	40	part 2) "will seek to maintain" ... a five year supply is not as positively worded as NPPF para. 73 that LPAs should identify a minimum of five years' worth of housing land.	Agree - make change

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
884	Daniel Owen RPS Consulting Services Ltd	Support	CS9	40	part 1) Support provision for 4320 dwellings in plan period and reference to Huncoat GV making significant contribution to it. Delivery of housing at Huncoat should be at higher end of 1000-2000 new homes scale.	Noted
721	Stuart Booth JWPC Ltd	Support	CS9	42	Support the inclusion of the 10% requirement of allocations to be on small sites of less than 1 hectare and suggest this is included within the policy.	Further consideration required
770	Joanne Harding The Home Builders Federation	General Comment	CS10	45	HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable and provides an appropriate mix for the location.	Further consideration required
711	Mohammed Ahmed Lancashire County Council (Environment Directorate)	General Comment	CS10	45	LCC request that policy CS10: Suitable Range of Housing is reconsidered on the basis that the requirement for adaptable homes only relates to affordable homes and that the percentage of adaptable homes required is below what is required to meet the needs of a wide range individuals in Hyndburn as they change throughout their life. We request that a policy change is considered that would require 100% of future housing is built to an adaptability standard of M4(2) or M4(3)- this reflects policies in other areas such as South Lakeland. Review of Hyndburn DM DPD Evidence Paper: Optional Housing Stds (August 2017) could support this.	Further consideration required
771	Joanne Harding The Home Builders Federation	General Comment	CS10	45	Not clear if part 1(B)(iii) of this policy is an aim or a requirement - needs to be clarified, Council should consider the format of the policy to help clarify it. If the Council wishes to adopt higher optional standards for accessibility the criteria set out in the PPG must be applied to evidence it, including: likely future need, size, location, type and quality of dwellings needed, accessibility and adaptability of existing stock, how needs vary across different housing tenures, and the overall viability. The HENA 2018 provides only limited evidence in this regard.	Agree - make change  The Council justified and demonstrated the need for this through its recent Development Management DPD EiP process. CS10 can be amended to clarify this. Viability evidence will be re-considered as part of preparing the Regulation 19 Local Plan

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
800	Ian Smith Historic England	Object	CS10	45	<p>Despite the number which were demolished in the 20th and beginning of the 21st centuries, the surviving mills from the period when Hyndburn was one of the major centres of textile production, are one of the defining features of the Borough's settlements. Work undertaken by Historic England showed that there were some 50 surviving mills in the Borough. Of this total, 6 were vacant and a further 10 only partially occupied or underused. Of the total estimated amount of floor space, some 61,000 square metres appears to be in vacant or under-used premises, equating to approximately 23% of the total floor space in mills across the Plan area.</p> <p>There is potential, therefore for the reuse of some of the vacant floorspace in historic mill buildings for residential development. Not all of these will necessarily be within the areas set out in Criteria 2(a) to 2(d). This should be reflected in this Policy.</p> <p>Suggested change to policy CS10 Criterion 2 add additional Criterion along the following lines:- “(e) part of a scheme which would involve the reuse or adaptation of a historic mill building”</p>	Further consideration required
799	Ian Smith Historic England	Support	CS10	45	<p>Subject to the change set out below, we welcome the requirement that new apartment developments will only be supported where they would maintain the character and of the area. This will help to ensure that the housing needs of the Borough are met in a manner which conserves the distinctive character of the local area.</p>	Further consideration required
786	Andy McLaren Lichfields	General Comment	CS10	45	<p>Consideration of the need for wheelchair user dwellings is acknowledged, however any requirement must be fully considered as part of any updated Viability Assessment to ensure it does not impact on the deliverability of schemes. An updated SHMA should be prepared to ensure conformity with the NPPF.</p>	<p>Further consideration required</p> <p>The Council justified and demonstrated the need for this through its recent Development Management DPD EiP process. CS10 can be amended to clarify this. Viability evidence will be re-considered as part of preparing the Regulation 19 Local Plan</p>
798	Ian Smith Historic England	Support	CS10	45	<p>We welcome the requirement that the mix of housing will take into account the character of the area. This will help to ensure that the housing needs of the plan area are met in a manner which conserves the distinctive character of the local area.</p>	Noted

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
674	Andy McLaren Lichfields	General Comment	CS10	45	Taylor Wimpey Broadly supports Policy CS1 which seeks to provide an appropriate range of housing. However, the 15-20% of market housing of 4+ bed size is considered relatively low in terms of Strategic Objective 1 (improving economic opportunities and support higher wage employment). Taylor Wimpey urges the Council to consider this further.	Further consideration required
890	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS10	45	Approach to range of housing is overly prescriptive with tension between the percentages in the table and determining mix on a site by site basis. Housing mix in the table may not remain up to date. Not clear if requirements for M4(2) and M4(3) homes have been subject of viability appraisal.	Further consideration required
1018	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	CS10	45	The table at 1a of the policy is considered to present a very inflexible approach and should be omitted or its weight should be explained in additional text. It also contradicts statements in the supporting text of the document.	Further consideration required
1026	Carole Woosey Environment Agency	Not Stated		52	The policies within this section cover the aspects of environmental protection which we would hope to see included in a local plan. The ten key ambitions of the government's 25 Year Environment Plan for the environment are captured within the following policies. Specific additions are sought in relation to separate policies (see separate representations policies CS12, 13, 15 & 16)	Noted
891	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS12	53	Criterion 1b) is considered a very detailed policy for A Core Strategy. Not clear if availability of types of products listed has been considered. Policy should be written to make clear this cannot be insisted upon. Criterion 1d) further clarity is needed regarding water recycling measures and impact on viability should be considered.	Further consideration required
1156	Adam Brennan United Utilities	Not Stated	CS12	53	detailed representation which strongly encourages revision to the Core Strategy to split flood risk and surface water management issues into two separate policies so that there will be a specific policy to cover surface water and foul drainage. Specific wording for the new separate policy is suggested.	Further consideration required Consider whether to split policies as suggested

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
633	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Support	CS12	53	Lancashire Wildlife Trust supports the inclusion of habitat related enhancements in Policy CS12: Sustainable Development and Climate Change.	Noted
1187	Angela Leigh Natural England	General Comment	CS12	53	The Plan should consider strategic impacts on water quality and resources (NPPF para 170), and address flood risk management. The relevant River Basin Management Plan should inform development proposed in Local Plans as they implement the EU Water Framework Directive and outline the main issues for the water environment and actions needed to tackle them. Link provided in representation.	Further consideration required  Policy CS12 provides the strategic overview of water quality and flood risk issues at present. Review to ensure all issues raised are covered. Relevant River Basin Management Plan to be reviewed to ensure relevant recommendations are integrated into the Local Plan as well.
1162	Adam Brennan United Utilities	Not Stated	CS12	53	recommend additional wording to policy to require new development to encourage water efficiency measures/techniques to minimise water use (e.g. rainwater recycling, green roofs, water butts) as part of the design process whilst ensuring potential is minimised for urban diffuse pollution to affect surrounding water courses and water bodies. Additional wording provided	Further consideration required  Consider additional wording
1211	Sport England	General Comment	CS12	53	SE would welcome revisions to this policy to acknowledge and deliver the concepts of active design in sustainable development to facilitate active lives for the Borough's residents as explained for policy CS1 (repID 1207)	Further consideration required
675	Andy McLaren Lichfields	General Comment	CS12	53	Taylor Wimpey agree with the council at aiming to minimise negative impacts on the environment and suggest finding cost effective solutions that tackle or adapt to climate change, and make all developments as energy efficient as possible. The Council should not impose planning obligations on sites which cumulatively could undermine viability and stifle growth.	Noted

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1027	Carole Woosey Environment Agency	General Comment	CS12	53	Detailed comments seeking amendments to the policy and supporting text in relation to: - rewording of 1c in relation to accurately reflect approach to development and flood risk; - amending para 7.17 to reflect that guidance on site specific surface water drainage is now obtained from LLFA rather than EA; - additional wording in para. 7.18 to make specific reference to de-culverting of water courses where possible; - para.7.20 and water efficiency - consideration to be given to whether it is appropriate to adopt standards higher than current Building Regulations standards if evidence is available; - rewording of 1h in relation to impacts of potentially polluting development; - the need to update the SFRA and produce a level 2 SFRA if needed to ensure up to date evidence base.	Agree - make change  Text changes to be incorporated into the Publication version plan, and update of the SFRA to be investigated further
1019	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	CS12	53	the supporting text at para. 7.21 is worded as policy but not reflected in the policy itself. It is questioned whether it has been viability tested.	Further consideration required
1197	Angela Leigh Natural England	General Comment	CS12	53	The Local Plan should consider climate change adaptation and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. GI and resilient ecological networks play an important role in aiding climate change adaptation.	Noted
754	Melanie Lindsley The Coal Authority	Support	CS12	53	The Coal Authority supports the notification within this policy which requires consideration of land instability issues associated with past coal mining activity and requires appropriate remediation and mitigation measures to be carried out where necessary.	Noted
693	Warren Hilton Highways England	General Comment	CS12	53	We welcome proposed development being located within sustainable locations, accessible to goods and services, and by a choice of modes of travel. Where development is being proposed in less sustainable locations, appropriate investment should be made to make the location more accessible by all modes of transport.	Noted  Policy CS21 supports Policy CS12 on this basis

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
755	Melanie Lindsley The Coal Authority	Support	CS12	57	The Coal Authority supports the notification within the supporting text that Hyndburn has a legacy of past coal mining activity and that land stability issues can be triggered by development activities.	Noted
634	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Support	CS13	58	Lancashire Wildlife Trust supports Policy CS13: Green Infrastructure.	Noted
801	Ian Smith Historic England	Support	CS13	58	We support this Policy. Several elements of the Green Infrastructure network are either heritage assets in their own right or contribute to the setting of other heritage assets within their vicinity. This Policy should also help to ensure, therefore, that the historic environment of the Borough is also protected and enhanced.	Noted
759	Tim Bettany-Simmons Canal and River Trust	General Comment	CS13	58	Consider this should be expanded to include the wider definition of green/blue infrastructure, especially as the canal is specifically noted and is a crucial corridor linking urban and rural areas. Reference to research on happiness and life satisfaction impacts of waterways (Simetrica Report) provided which could be referenced from paragraph 7.28-7.29	Agree - make change
1212	Sport England	Support	CS13	58	SE support this policy but would welcome specific mention of the value of playing fields, sporting and other recreational sites to the GI network, as well as reference to para 97 of the NPPF and the PPS & BSFS in the evidence base	Agree - make change
1185	Angela Leigh Natural England	General Comment	CS13	58	Green Infrastructure is relevant to both urban and rural contexts and a strategic approach to green infrastructure should be supported by a green infrastructure strategy. We encourage a specific policy in the Local Plan or alternatively integrate an approach into other policies around biodiversity, green space, flood risk, and climate change, reflecting the multifunctional benefits of green infrastructure.	Agree - no change  The Council has provided draft Policy CS13 in the Core Strategy to outline the strategic approach to GI. A number of pieces of evidence base work are also underway to feed into the GI strategy and network (e.g. Habitats Surveys, Open Space Audit, Woodland mapping, Playing Pitch Strategy).

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1028	Carole Woosey Environment Agency	General Comment	CS13	58	It would be helpful for developers and neighbouring LPAs to see the existing and planned green infrastructure on the proposal map. Clear mapping of green infrastructure would provide protection for these areas and also assist decision makers in determining how they could be extended and enhanced for maximum benefit for the environment and the community.	Further consideration required
802	Ian Smith Historic England	Support	CS14	59	The landscapes of the borough are one of the defining features of the Plan area and make a huge contribution to the character and setting of its settlements. This Policy will help to ensure that development proposals do not harm this key element of Hyndburn's character.	Noted
1196	Angela Leigh Natural England	General Comment	CS14	59	NE expects the Plan to include strategic policies to protect and enhance valued landscapes, as well as criteria based policies to guide development, as set out in NPPF.	Noted Draft policy CS14 and adopted policy DM18
629	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	CS15	61	Policy CS15 does not take sufficient account of 'priority species' (protected under S41 of the NERC Act 2006). Para 7.45 does not match the mitigation hierarchy (i.e. compensation and enhancement elements). Shortfalls could be addressed in DM19 of the DM DPD.	Agree - make change The Council is not updating the DM DPD but can make amendments to Policy CS15 to ensure policy gaps are filled
1029	Carole Woosey Environment Agency	Not Stated	CS15	61	The commitment to net gain is positive, but the plan needs reference to how this can be quantified. This could be by developing your own approach to net gain delivery (e.g. as done by Lichfield, South Cambridge) or the Core Strategy should include a means to allow any new national guidance / advice on the delivery of net gain to be used when it becomes available. Developing a means of measuring net gain so that improvements can be quantitatively measured means that mitigation strategies or compensation payment for developments to secure net gain can be more easily identified.	Further consideration required
628	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	General Comment	CS15	61	Important to work with LERN to identify how the Nature Recovery Network can be made to work best, and most efficiently for Hyndburn and adjacent authorities for cross boundary issues and opportunities.	Noted The Council will continue to work with LERN prior to Publication of the Local Plan in 2020

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1192	Angela Leigh Natural England	General Comment	CS15	61	To strengthen the plan further, specific reference could be made to para 175c of NPPF and identifying blanket bog (deep peat 40cm or deeper) in Hyndburn as being irreplaceable habitat (potential areas currently not mapped in Hyndburn).	Further consideration required  Consider whether to do investigative work or just refer in policy to ensure that habitat is recognised and will be protected where future areas are identified.
1191	Angela Leigh Natural England	General Comment	CS15	61	Local Biodiversity Action Plans identify local action needed to deliver UK targets for habitats and species, species of local importance, and can provide a useful blueprint for biodiversity enhancement in any particular area. Ecological networks are coherent systems of natural habitats a key principle of which is to maintain connectivity (to enable free movement and dispersal). Where a plan contains irreplaceable habitats (e.g. ancient woodland/veteran trees) the should be appropriate policies in place to ensure their protection. NE provides links to standing advice on irreplaceable habitats and protected species.	Further consideration required  Consider referencing standing advice from policy
1186	Angela Leigh Natural England	General Comment	CS15	61	The plan should set out a strategic approach to protect, enhance and manage biodiversity and geodiversity. Natural England recommends inclusion of a measurable net gain policy and the use of a biodiversity metric calculation so it is aligned with the Government's 25 Year Environment Plan and the NPPF. Links provided in representation. Para 174 of the NPPF should be referenced in policy. NE would also like to see details of specific habitat types that would be most appropriate for enhancement, placing the emphasis on increased size, quality and quantity or priority habitats within core areas, corridors or stepping stones that improves connectivity.	Further consideration required  Consider amendments to Policy CS15 to reference 'measurable' net gain.
892	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS15	61	Considers that the policy is overly onerous in some respects. Criterion 1a) should be amended to state that ecological resources should be protected where possible and their loss suitably mitigated for where not.  Considers that there could be a tension between the requirement in criteria b of bullet point one for there to be a net gain in ecological resources and the higher densities of development sought in Policy CS9 and the housing mix set out in Policy CS10. Development that include larger dwellings, that are landscape led, will often result in a lower density of development. It is also not clear whether the impact of ensuring a net-gain in ecological resources has been included within an overall viability appraisal.	Further consideration required  The Council will re-consider viability issues of the plan and evidence prior to Publication in 2020

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1129	Warren Melia	General Comment	CS16	64	Detailed comments submitted in relation to the potential for installing solar arrays on roofs of terraced housing around the Borough, generating energy and guaranteeing jobs, and on large industrial buildings such as at Frontier Park.	Further consideration required
869	Helen Holland Blackburn with Darwen Borough Council	General Comment	CS16	64	Blackburn with Darwen Council note the intended approach considering areas of search based on the existing evidence base commissioned jointly with Blackburn with Darwen Council. The study was published in 2012 and the Council would be happy to discuss further whether there is a need to refresh the study in light of any additional updated national policy guidance.	Further consideration required
803	Ian Smith Historic England	Object	CS16	64	Whilst we support the thrust of this Policy, as worded, in areas of search, proposals will be accepted provided that measures are taken to avoid or minimise the negative impacts. So long as the proposals take some measures to avoid harm and where appropriate, mitigation is provided, then, theoretically, such schemes could receive approval. In an area where the landscape character is such a fundamental component of the area's character, it is essential that the Policy makes it clear that where there is harm, such schemes will not be approved unless the wider benefits outweigh that harm. Suggest CS16, Criterion 1 is amended to read:- “..will be supported where there are no unacceptable adverse effects upon the environment or local communities arising from the construction and operation of the development”	Further consideration required
1031	Carole Woosey Environment Agency	General Comment	CS16	64	CS16 2) The Environment agency should be included among those that developers must engage with in relation to renewable energy schemes as development may require permits or consent. Early engagement on hydro schemes is particularly sought.	Further consideration required
676	Andy McLaren Lichfields	General Comment	CS17	65	Taylor Wimpey supports Policy CS17 High Quality Design and Heritage, however any policy regarding design must not be overly onerous and should not stifle innovation or viability.	Noted
679	Davina Helm Lancashire Constabulary Designing Out Crime Officers	General Comment	CS17	65	Propose additional wording to the paragraph, with reference to crime and designing out crime.	Agree - make change

**Representations made to the Core Strategy Review consultation draft**

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
893	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS17	65	Supports the intention of the policy but considers that the third point should be deleted or reworded. It is likely that all proposals will be considered in a manner consistent with the NPPF.	Further consideration required  Consider modifications in consultation with the Council's Conservation Officer and taking into account recently adopted DM DPD Policy DM22 and DM23

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
804	Ian Smith Historic England	Object	CS17	65	<p>General</p> <p>The Borough's heritage assets make an important contribution to the distinctive character of its towns and villages, to the economy, and to the quality of life of its communities. It is important, therefore, that the plan sets out a robust Policy framework for the effective management of this resource.</p> <p>NPPF Paragraph 17 sets out a requirement that development plans include Strategic Policies to address each local planning authority's priorities for development and other use of land in its area. Paragraph 20 makes it clear that Local Plans should include Strategic Policies that address the conservation and enhancement of the historic environment.</p> <p>Given this clear advice, it is not considered that the proposed Policy provides an appropriate framework to address the particular strategic priorities of the plan area insofar as the historic environment is concerned. Indeed, as written it could apply to any local planning authority in the country.</p> <p>It would be helpful if this overarching Policy identified the elements of Hyndburn's historic environment which are of especial importance to the character and distinctiveness of the area and which might, as a result, warrant particular attention in determining the appropriateness of applications.</p> <p>In view of the fact that the Core Strategy Review proposes to include a separate Strategic Policy for all the individual topics set out in NPPF Paragraph 20(d) with the exception of the historic environment, for consistency, Design and the Historic Environment should be separated into two Strategic Policies.</p> <p>Detailed comments</p> <p>Criterion 2</p> <ul style="list-style-type: none"> <li>· It is not just the 'design' of new development which could harm the significance of a heritage asset. Changing the original use of a building could also have an adverse impact upon its significance</li> <li>· Given that the NPPF uses the term 'conserve', it would be more appropriate to use the same terminology in this Policy.</li> <li>· The Glossary to the NPPF makes it clear that 'conservation' is the process of maintaining and managing change to a heritage asset in a way that sustains and, 'where appropriate', enhances its significance. This ought to be reflected in this Criterion.</li> <li>· NPPF Paragraph 184 requires heritage assets to be conserved in a manner 'appropriate' (not proportionate) to their significance.</li> </ul>	<p>Further consideration required</p> <p>Consider modifications in consultation with the Council's Conservation Officer and taking into account recently adopted DM DPD Policy DM22 and DM23</p>

## Criterion 3

· This Criterion only addresses designated heritage assets. There is no mention of the approach that should be taken to non-designated heritage assets.

Paragraph 185 of the NPPF requires Local Plan to set out a positive strategy for the conservation and enjoyment of the historic environment, 'including heritage assets most at risk through neglect, decay or other threats'. At present, there is no mention of Heritage at Risk in this Strategic Policy.

## Suggested Changes:

(a) Split Policy CS17 into two Policies, one dealing with Design and one dealing with the historic environment.

(b) Delete Criterion 2 and 3 and replace with:-

"1. The Borough's heritage assets will be conserved in a manner appropriate to their significance. Developments which will help in the management, conservation, understanding and enjoyment of the Borough's historic environment, especially for those assets which are at risk, will be encouraged. Particular attention will be paid to the conservation of those elements which contribute most to Hyndburn's distinctive

character and sense of place These include:-

· The legacy of buildings associated with the Borough's role as one of the leading centres of textile manufacture including the mills, warehouses, weaving sheds, reservoirs, chimneys, cotton exchanges, and terraced housing together with the associated public parks, town Halls, libraries and other public buildings.

· The buildings, bridges, locks and other structures associated with the Leeds- Liverpool Canal especially the former chemical works associated with bleaching, dyeing and Calico printing

· Buildings constructed from the distinctive "Accrington NORI" bricks

· The remaining groups of handloom weavers cottages in the rural settlements

· The legacy of 18th and 19th century Methodist and other non-conformist chapels.

2 Proposals affecting a designated heritage asset (or an archaeological site of national importance) should conserve those elements which contribute to its significance. Harm to such elements will be permitted only where this is clearly justified and outweighed by the public benefits

of the proposal. Substantial harm or total loss to the significance of a

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
					designated heritage asset (or an archaeological site of national importance) will be permitted only in those circumstances set out in the NPPF. 3 Proposals which would remove, harm or undermine the significance of a non-designated heritage asset will only be permitted where the benefits are considered sufficient to outweigh the harm having regard to the scale of any harm and the significance of the asset. 4. The Council ... etc	
1213	Sport England	General Comment	CS17	65	Policy should make reference to Active Design as per other SE representations, either here or via a separate policy as set out under RepID 1207	Further consideration required
1159	Adam Brennan United Utilities	Not Stated	CS17	65	Recommendation to included additional wording in revised policy so that drainage is considered at a much earlier stage in the design process and which will contribute to well designed places	Further consideration required Consider additional wording
894	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS18	69	Considers the policy is not positively worded and does not allow other material considerations to outweigh harm in decision making. There is lack of clarity over "other nuisances"	Further consideration required
842	Mohammed Ahmed Lancashire County Council (Environment Directorate)	General Comment	CS18	69	We would like to commend Policy CS18 Environmental Amenity and Air Quality in its demonstration of the intention to mitigate the impacts of traffic volume on air quality. However, the referenced policy DM29 Environmental Amenity, contains no specific measures to address air quality from new developments. Whilst the policy relates to the location of new developments in proximity to other polluting developments, it does not attempt to address how the new development itself will contribute to air pollution through increased car use, or any mitigation requirements that might be implemented to address this.	Further consideration required
1160	Adam Brennan United Utilities	Not Stated	CS18	69	UU's position is that it would be more appropriate to identify sites for housing which are not close to sensitive uses e.g. waste water treatment works. Refer to the "agent of change" principle (NPPF para.182) which aims to ensure that existing uses do not have unreasonable restrictions placed on them as a result of new development being permitted. Additional wording suggested to reflect this.	Further consideration required Consider additional wording.

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
694	Warren Hilton Highways England	Support	CS18	69	Support for Policy CS18: Environmental Amenity and Air Quality. Developments should identify opportunities to improve air quality or mitigate impacts through the design and management of the development or associated infrastructure.	Noted
1188	Angela Leigh Natural England	General Comment	CS18	69	Natural England expects the plan to address the impacts of air quality on the natural environment. In particular, traffic impacts associated with new development where this impacts on European Sites and SSSIs. The effects on local roads of proposed development and impacts on vulnerable sites from air quality effects can be assessed using traffic projections and the 200m distance criterion following local air quality modelling where required. Designated sites at risk from local impacts are those within 200m of a road with increased traffic expected.	Further consideration required  Consider amendment to policy to specifically reference natural environment in terms of air quality. Also review proposed sites and protected sites in terms of 200m distance criterion.
806	Ian Smith Historic England	Object	CS19	70	The Leeds and Liverpool Canal and its associated buildings and structures are a defining feature of the towns and countryside of the northern part of the Plan area. There should be a requirement as part of this Policy to retain and, where appropriate, reuse any historic buildings and, where new buildings are proposed, that they reinforce the canal-side character.  Suggested change: Policy CS19 add the following additional sub-Criteria:- “f. Retain and, where appropriate, reuse existing historic canal-side buildings. g. New development should retain or reinforce the canal-side character of the local area”	Agree - make change
805	Ian Smith Historic England	Support	CS19	70	Subject to the change set out below, we support this Policy The Leeds and Liverpool Canal and its associated buildings and structures are a defining feature of the towns and countryside of the northern part of the Plan area.	Further consideration required

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
760	Tim Bettany-Simmons Canal and River Trust	Support	CS19	70	The trust fully support the provision of a standalone policy relating to our waterways which specifically deals with all development adjacent to the Leeds and Liverpool Canal asset. However suggest that 'development should be of an appropriate scale and mass' should be added to either existing criteria or added as a new one. Also that 'development should not harm the structural integrity of the waterway infrastructure' (give recognition to ground stability issues). Reference to renewable energy and the role that waterways can play should be made. Finally, policy could be expanded to include reference to the potential for surface water discharge to be accepted (with prior consent from CRT and subject to completion of a commercial agreement).	Further consideration required
1214	Sport England	Support	CS19	70		Noted
852	Tim Bettany-Simmons Canal and River Trust	General Comment	CS19	71	Please update 'Canals and Rivers Trust' to reflect registered name 'Canal & River Trust'	Agree - make change
853	Tim Bettany-Simmons Canal and River Trust	General Comment	CS19	71	Paragraph could be expanded by adding that 'service yards/bin stores/main access roads etc should not be located adjacent to the waterway'	Agree - make change
851	Tim Bettany-Simmons Canal and River Trust	General Comment	CS19	71	Paragraph could be expanded to include a signpost to CRT website where the information on planning and design and 'creating successful waterside places' is provided. Expand text to read 'The canal provides a variety of economic, social, health and wellbeing and environmental benefits and in Hyndburn and Lancashire it links urban and rural communities with the wider landscape'	Further consideration required
870	Helen Holland Blackburn with Darwen Borough Council	General Comment	CS20	74	Blackburn with Darwen Council is supportive of the need to consider potential improvements to the M65. This is consistent with existing proposals to improve the general connectivity afforded by the M65 including junction improvements.	Noted

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
695	Warren Hilton Highways England	General Comment	CS20	74	In recent years there has been investment to improve J6 and J7 of the M65. Hyndburn evidence indicates that J8 is also in need of improvement if it is to safely and effectively manage traffic generated from planned developments. Although J8 is in Burnley it is a key connecting junction between Pennine Lancashire and Greater Manchester. A key element of the Core Strategy also relates to the development of Huncoat Garden Village. The potential of an extension of Altham Business Park would also increase traffic. Highways England would welcome the opportunity to work with Hyndburn BC to ensure a robust transport evidence base. Given Blackburn with Darwen is at Issues and Options stage and share a housing market area there is strong likelihood that development in these respective areas will lead to a high degree of local trips between housing and employment uses along the M65.	Noted  The Council will be undertaking further evidence base work on Transport matters and will consult Highways England on this prior to work being commenced.
575	Diane Clarke Network Rail	General Comment	CS21	76	Network Rail would welcome the opportunity to work with Hyndburn BC and Lancs CC to explore opportunities for the development of Huncoat Garden Village and associated rail infrastructure needed.	Noted  Further consultation to take place with Network Rail specifically around the Huncoat Garden Villabe proposals
895	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS21	76	General support for the policy, but is not clear whether the requirement for electric vehicle charging (criteria c of bullet point one) has considered either the viability or the additional energy requirements of such a requirement. Criterion e of bullet point one should be amended to reflect the fact that highway improvements can be secured through planning condition as well as legal agreements.	Further consideration required
680	Davina Helm Lancashire Constabulary Designing Out Crime Officers	General Comment	CS21	76	In relation to proposing car park provision across the Borough, text proposed around principles and security standards - include reference to the 'Park Mark Safer Parking Scheme'	Agree - make change
1215	Sport England	General Comment	CS21	76	SE support this policy however it could be stronger in that it could promote active design which facilitates more active travel enable people to become more active in their everyday lives, enhancing walking routes in and around towns to attract people to do more walking and cycling. See also RepID 1207	Further consideration required

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1194	Angela Leigh Natural England	General Comment	CS21	76	The plan should seek to link existing rights of way where possible, and provide for new access opportunities.	Further consideration required
696	Warren Hilton Highways England	Support	CS21	76	Support for Policy CS21: Sustainable and safe transport	Noted
697	Warren Hilton Highways England	Support	CS22	78	Support for Policy CS22: Cycle and Footpath Networks	Noted
1216	Sport England	General Comment	CS22	78	SE support this policy but it should have a wider remit to require new developments to incorporate cycle, footpath and bridleway links and extensions into their own proposals. Greater accessibility to a range of community resources and assets could result, and to just access the countryside.	Agree - make change
896	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS22	78	It is not considered necessary for proposed developments to fund the improvement and maintenance of existing footpaths. Any financial contributions must be 'CIL compliant'. It is unclear why a development would be unacceptable in principle on planning grounds for not making a financial contribution to the maintenance of existing footpaths, which is a service that should be delivered by the Council.	Further consideration required
1107	Amy James Indigo Planning	Object	CS23	81	consider that balnket approaches of CS23 1)&2) are unduly restrictive, not consistent with NPPF and should be re-worded accordingly	Further consideration required
1108	Amy James Indigo Planning	Support	CS23	81	Support in principle for CS23 part 4) to ensure permanence of Green Belt boundaries. However safeguarded sites should be able to come forward when needed, not just beyond plan period. Policy should be reworded to reflect this flexibility.	Further consideration required
1120	Joshua Hellowell PWA Planning	Support	CS23	81	We are in agreement that significant green belt release around Accrington and its associated townships should be considered in this Local Plan in the context of permanence of green belt boundaries and safeguarding land.	Noted

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1032	Carole Woosey Environment Agency	General Comment		83	Suggest that it may be of use to have a paragraph for each of the local plan that identifies the key environmental constraints present in that area. This could be added alongside the existing references to opportunities for green infrastructure.	Further consideration required
1043	Stuart Booth JWPC Ltd	Object	CS24	84	Potential for more housing to be delivered at Accrington and other areas, should Huncoat development stall due to size of proposal and need for masterplanning and infrastructure. Should additional sites be identified beyond minimum numbers to ensure housing delivery keeps pace with Housing Delivery Test and provides five year supply of housing.	Further consideration required
1097	Christopher McGough McGough Planning Consultants Ltd	General Comment	CS24	84	In relation to policy CS24, client welcomes the apportionment of 950 new homes for the area (which includes Broad Oak), but as Accrington Central is Hyndburn's most sustainable settlement (by a considerable margin), this figure should be expressed as a minimum and not a maximum as is presently the case. In paragraph 1, the words "up to 950 homes" should be replaced with "at least 950 homes".	Further consideration required
1020	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	CS24-CS3	84	All policies state that, "the Council will seek to identify land for delivery of up to ....dwellings". This is inappropriate and does not match wording in rest of document. The policies should refer to the delivery of around or a minimum number of homes.	Further consideration required
1109	Amy James Indigo Planning	Object	CS27	89	Policy wording effectively places a cap on new housing stating 'up to' 350 homes. This does not reflect the overall housing delivery target for the Borough which does not place a cap - states an 'at least' figure. Clayton-le-Moors' role as part of a Principal Town, its facilities, accessibility and public transport, and plans for strategic employment hubs lend itself to higher housing growth. A strict blanket approach to all sites within green belt being retained is not supported.	Further consideration required
1039	Stuart Booth JWPC Ltd	Object	CS27	89	Potential for more housing to be delivered at Clayton le Moors and other areas, should Huncoat development stall due to size of proposal and need for masterplanning and infrastructure. Should additional sites be identified beyond minimum numbers to ensure housing delivery keeps pace with Housing Delivery Test and provides five year supply of housing.	Further consideration required

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
715	Patricia Ralph	General Comment	CS27	89	Plan to build 360 new homes in Clayton-le-Moors over plan period 2016-2036, however disagree building homes on Green Belt land which has been allocated as brownfield sites for 451 homes have been identified.	Further consideration required  Take into account in considering preferred sites for allocation. Some sites identified at Reg18(2) stage may prove to be undeliverable following further investigation
748	Judith Horgan Stephen Ward Town Planning & Development Consultants Ltd	General Comment	CS28	92	Requested that the new Core Strategy make specific reference to land in and around the abattoir (Factory site) and its potential to accommodate warehousing/storage/distribution uses and/or mixed use development including significant residential elements.	Further consideration required
655	Trevor Hobday Trevor Hobday Associates	Object	CS28	92	Intention is to focus new development within the existing urban boundary, high number of brownfield sites allocated which may not be viable. Proposes extending the urban boundary of Great Harwood to the west as sites here are immediately available to develop and are viable and thereby can meet 5 year housing land supply.	Further consideration required  Take into account in considering preferred sites for allocation and preparing Publication Local Plan
639	Mark Hope	Object	CS28	92	Concern over delivery of 460 homes in Great Harwood upto 2036 as number of homes stated not suitable for existing transport links and no secondary school. Objects to figure and proposes to reduce homes target to 250-300	Further consideration required  To be confirmed at Publication stage of the plan once Growth Option and Spatial Option are confirmed and supply of suitable, available, achievable sites is also confirmed
686	Judith Douglas Judith Douglas Town Planning Limited	Support	CS28	92	Supports the Council's aspiration to identify land for the delivery of 460 homes in Great Harwood - this should though be expressed as a target not a ceiling. Release of Green Belt land around Great Harwood is likely to create sites which have good viability and could deliver affordable housing and provide the suitable sites for 'aspirational homes' the Council is aiming for. Weight should be given to this in the selection of sites.	Further consideration required
898	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS29	94	Former Huncoat Power Station: The CS DPD and SA DPD do not commit to removing current CS employment allocation. RE-iterates that the employment allocation is no longer viable and the site should be allocated for residential development.	Further consideration required  The Council will clarify this position in the Regulation 19 Publication Local Plan following completion of the Huncoat Masterplan

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1042	Stuart Booth JWPC Ltd	General Comment	CS29	94	Proposal to deliver 1,500 homes during the Plan Period is aspirational, but needs to be considered that development of this scale requires masterplanning and significant new infrastructure, such that development in early phases of plan is unlikely. Plan needs to provide flexibility to allow other locations to take up any slack in the housing delivery figures resultant from delays to the delivery at Huncoat. Potentially a need to over allocate housing land in other parts of the Borough to ensure that five year land supply is maintained on a rolling basis and Housing Delivery Test is passed.	Noted
897	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS29	94	Bullet point one is vague. Council should identify land for delivery of home rather than "seek to identify". Plan would be more robust if it identified all land for development in the HGV rather than just the homes likely to be delivered in the plan period.	Further consideration required
900	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS29	94	Reference should be made to the importance of the former Huncoat Power Station as a potential development site in addition to its importance as a key part of the wider HGV. Concerns over the role of an equalisation agreement. If agreement is not reached, this should not prevent the development of the former Huncoat Power Station from coming forward.	Further consideration required
720	Stuart Booth JWPC Ltd	General Comment	CS29	94	Proposal to deliver 1,500 homes during the plan period is aspirational, however plan needs to provide flexibility to allow other locations to take up any slack in the housing delivery figures resultant from delays to delivery at Huncoat.	Further consideration required
899	Daniel Owen RPS Consulting Services Ltd	Not Stated	CS29	94	Plan should be clear whether references to seeking improvements to the Peel Park Nature Reserve and to other parts of the countryside (such as the Leeds and Liverpool Canal and Hambledon Hill) relates to additional financial contributions, and if so this should be included in the viability appraisal.	Further consideration required
1038	Stuart Booth JWPC Ltd	General Comment	CS29	94	Proposal to deliver 1,500 homes during the Plan Period is aspirational, but needs to be considered that development of this scale requires masterplanning and significant new infrastructure, such that development in early phases of plan is unlikely. Plan needs to provide flexibility to allow other locations to take up any slack in the housing delivery figures resultant from delays to the delivery at Huncoat. Potentially a need to over allocate housing land in other parts of the Borough to ensure that five year land supply is maintained on a rolling basis and Housing Delivery Test is passed.	Noted

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
692	Warren Hilton Highways England	General Comment	CS29	94	We note that the range of number of homes specified in this policy is not the same as set out in CS2: Huncoat Garden Village and suggest that this needs to be addressed in the next iteration of the plan.	Noted  There are a number of reasons for this: the fact that the Huncoat masterplan was still at an 'options' stage when the Regulation 18(2) Local Plan was published; the figure of total housing in Policy CS2 may extend beyond the Local Plan period of 2036 (see footnote 28); and the Huncoat area set out in Policy CS29 includes additional land outside of the anticipated Huncoat Garden Village boundary.
871	Helen Holland Blackburn with Darwen Borough Council	General Comment	CS29	94	<p>Blackburn with Darwen Council recognises the importance of the proposals at Huncoat within the overall spatial strategy for Hyndburn's emerging Core Strategy. It is noted that the draft Core Strategy describes the proposals for Huncoat in the following manner:</p> <p>"...garden village would be of significance not just to Hyndburn but also to the wider Pennine Lancashire sub-region, due to its strategic location on both the road and rail networks."</p> <p>There are already close working relationships between the two authorities under the duty to cooperate including the recently published joint evidence base (Housing and Economic Needs Assessment – HENA study). Dialogue will continue between the two authorities to ensure that development proposals both within Blackburn with Darwen and Hyndburn, including Huncoat, will deliver complementary growth for the two authorities.</p>	Noted

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Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1065	Nigel Aubrey	Object	CS30	96	<p>Provision for 400 new homes in Rishton is considered excessive and is a significant concern as this is the biggest plot in comparison to any of the other site references for an already overstretch population of 9000 residents in Rishton already.</p> <p>The plan fails to take into account the significant traffic problems which Rishton experiences at peak times which will be exacerbated by new housing. Great Harwood is considered to have a much stronger level of public amenities, particularly in relation to medical health services and dental services as opposed to services which are under considerable pressure in Rishton.</p>	Further consideration required
1073	E Neville	Object	CS30	96	<p>Lack of reference throughout plan to community regeneration plan for Rishton, which is needed to address economic, social and environmental decline and regeneration of housing stock. Financial benefits of new housing should address these issues.</p>	Further consideration required
1076	E Neville	Object	CS30	96	<p>Provision for 400 new homes in Rishton is considered excessive and is a significant concern as this is the biggest plot in comparison to any of the other site references for an already overstretch population of 9000 residents in Rishton already.</p> <p>The plan fails to take into account the significant traffic problems which Rishton experiences at peak times which will be exacerbated by new housing. Great Harwood is considered to have a much stronger level of public amenities, particularly in relation to medical health services and dental services as opposed to services which are under considerable pressure in Rishton.</p>	Further consideration required
1130	Warren Melia	Not Stated	CS30	96	<p>The proposed level of new housing, in conjunction with growth planned in Great Harwood and Clayton-le-Moors, is too great for local primary and secondary schools to cope - insufficient spaces.</p>	<p>Further consideration required</p> <p>Impact of planned growth on schools will be looked at as part of the Infrastructure Delivery Plan supporting the Core Strategy Publication version</p>
1084	Kevin Parkinson	Object	CS30	96	<p>Lack of reference throughout plan to community regeneration plan for Rishton, which is needed to address economic, social and environmental decline and regeneration of housing stock. Financial benefits of new housing should address these issues.</p>	Further consideration required

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1086	Kevin Parkinson	Object	CS30	96	<p>Provision for 400 new homes in Rishton is considered excessive and is a significant concern as this is the biggest plot in comparison to any of the other site references for an already overstretched population of 9000 residents in Rishton already.</p> <p>The plan fails to take into account the significant traffic problems which Rishton experiences at peak times which will be exacerbated by new housing. Great Harwood is considered to have a much stronger level of public amenities, particularly in relation to medical health services and dental services as opposed to services which are under considerable pressure in Rishton.</p>	Further consideration required
558	Jeff Scales	General Comment	CS30	96	Allocation for new housing in Rishton is too high compared with other areas (particularly Great Harwood). Traffic problems and public amenities in Rishton a key factor	<p>Further consideration required</p> <p>To be confirmed at Publication stage of the plan once Growth Option and Spatial Option are confirmed and supply of suitable, available, achievable sites is also confirmed</p>
1062	Nigel Aubrey	Object	CS30	96	Lack of reference throughout plan to community regeneration plan for Rishton, which is needed to address economic, social and environmental decline and regeneration of housing stock. Financial benefits of new housing should address these issues.	Further consideration required
779	Derek Evans	Object	CS30	96	The addition of 490 new homes in Rishton, with a potential 1000-2000 persons and possibly 500 vehicles will put an over demanding burden on existing services (schools, roads, health) Bus services are good but train stopping service is poor.	<p>Further consideration required</p> <p>To be confirmed at Publication stage of the plan once Growth Option and Spatial Option are confirmed and supply of suitable, available, achievable sites is also confirmed</p>
1051	Mary Aubrey	Object	CS30	96	Lack of reference throughout plan to community regeneration plan for Rishton, which is needed to address economic, social and environmental decline and regeneration of housing stock. Financial benefits of new housing should address these issues.	Further consideration required

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1054	Mary Aubrey	Object	CS30	96	<p>Provision for 400 new homes in Rishton is considered excessive and is a significant concern as this is the biggest plot in comparison to any of the other site references for an already overstretched population of 9000 residents in Rishton already.</p> <p>The plan fails to take into account the significant traffic problems which Rishton experiences at peak times which will be exacerbated by new housing. Great Harwood is considered to have a much stronger level of public amenities, particularly in relation to medical health services and dental services as opposed to services which are under considerable pressure in Rishton.</p>	Noted
647	Robert Barnes Planning Prospects Ltd	Object	CS31	99	Proposes additional text to be added to Policy CS31: Oswaldtwistle to clarify its role in the growth strategy of the Principal Town of Accrington in Policy CS1 (Spatial Development Strategy) - specific wording recommended.	Further consideration required
1121	Joshua Hellowell PWA Planning	General Comment	CS31	99	Given the restrictions attached to the release of Green Belt land west of Brookside Business Centre, and questions over its deliverability/viability, the Council should give notable weight to the potential significance of land north of Blackburn Road (site 57) as a strategic site for the area (potential to contribute 350+ dwellings).	Further consideration required
1021	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	CS31	99	Reference at point 2 to redevelopment of the whole site and removal from Green Belt is inappropriate; it is a PDL site in terms of NPPF and its redevelopment in these terms would give greater degree of control.	Further consideration required

## Representations made to the Core Strategy Review consultation draft

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
872	Helen Holland Blackburn with Darwen Borough Council	General Comment	CS32	102	<p>Blackburn with Darwen Council notes the approach outlined for Knuzden and Whitebirk. The intentions for Whitebirk are noted and will feature in any future duty to cooperate discussions. The role of the Peel Centre is also noted and the recognition that any additional development at the site must complement the role of town and local centres in Blackburn with Darwen and Hyndburn.</p> <p>The current Policy DM3 in the adopted Development Management DPD includes the need for developments in edge/out of centre locations to include retail impact assessments subject to specific thresholds set out in the policy. This provides an important policy test that any future development at the Peel Centre will need to be judged against, notwithstanding the additional draft policy wording set out in Policy CS32.</p>	Noted
833	Warren Hilton Highways England	General Comment	CS32	102	Highways England has concerns over how the release of further Green Belt land around J6 could be accommodated by the roundabout at Whitebirk	<p>Noted</p> <p>Further transport evidence to be undertaken will help to address this concern and understand future capacity of the network</p>
743	Nick Pleasant NJL Consulting	General Comment	CS32	102	Direction of travel is welcomed, but further amendments to the policy would ensure The Peel Centre can meet established demand for improved local facilities in Knuzden & Whitebirk. Concerned with the words 'predominantly' and '40%' as this seems to be arbitrary without clear justification. The threshold may need to be changed or clarified and refined in terms of definition to allow non-retail uses, and food retail, as the purpose may be to just limit open non-food A1 retail use. Policy should have more flex.	Further consideration required
745	Nick Pleasant NJL Consulting	General Comment	CS32	102	A further line should be added to the policy which recognises the role of the Peel Centre in the hierarchy, and therefore that additional development up to the 2,500sqm threshold and certain changes of use should not be subject to the town centre use tests (i.e. the 'sequential' and 'impact' tests) as identified for emerging Policy CS5 as well.	Further consideration required

**Representations made to the Core Strategy Review consultation draft**

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
860	Joanne Harding The Home Builders Federation	General Comment		104	The HBF would expect the Local Plan to contain a monitoring framework and appropriate targets and triggers and appropriate remedial actions which should be taken if targets or triggers are not met. Housing triggers could include the lack of a 5YHLS which is below anticipated housing trajectory, potential actions to include working with developers, producing masterplans, allocating further sites, reducing Local Plan requirements or preparing a new Local Plan.	Agree - make change  Further details on a monitoring framework will be produced in the Publication version of the Local Plan

# Appendix 2: Representations made to the Site Allocations DPD consultation draft

Comments and proposed Council response

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
873	Helen Holland Blackburn with Darwen Borough Council	General Comment			Blackburn with Darwen Council has no specific comments to make on the Site Allocations DPD. Dialogue will continue between the two authorities to ensure that development proposals both within Blackburn with Darwen and Hyndburn will deliver complementary growth for the two authorities.	Noted
1164	Adam Brennan United Utilities	General Comment			Sets out UU's expectations to site selections, namely: locate development in areas where infrastructure is available with capacity/ coordinate delivery of development with delivery of infrastructure; give particular consideration to infrastructure requirements where these do not currently exist or will need upgrading in relation to greenfield sites; and give preference to sites which have sustainable alternatives available to combined sewer for discharge of surface water e.g with close proximity to defined physical features such as watercourse - this should be done in liaison with LLFA.	Further consideration required Matters to be considered in developing preferred sites in consultation with UU and LLFA
1163	Adam Brennan United Utilities	General Comment			Comments relating to desire to continue the constructive communication with the Council to date in preparing Site Allocations emphasising strong connection between development and infrastructure planning. Information provided about UU assets in relation to proposed sites. Encourages use of pre-application service to identify impacts of development at early stage in process.	Noted
1126	Lynne & Dennis Webster	Object			Object in general to any greenfield sites/open green spaces being used for housing development	Further consideration required Take into account in considering preferred sites for allocation
1123	Joshua Hellawell PWA Planning	General Comment			Due to the current housing supply situation in the Borough, and issues around viability on brownfield sites, it is considered that a partial redefining or urban boundaries in the Borough will prove unavoidable.	Noted
1122	Joshua Hellawell PWA Planning	General Comment			To disregard sites based on their greenfield location outside of recognised settlement boundaries will fundamentally hamper the Council's ability to demonstrate a sound supply of housing for the entire plan period.	Noted The Council will allocate sufficient sites in the plan that are demonstrated to be suitable, available and achievable (deliverable)

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
541	Elaine and David Stanton	General Comment			Develop brownfield sites. Regenerate existing sub-standard housing (provide grants). Improve infrastructure	Noted  These policy aims are set out in policy CS1 and are reflected in the Site Assessment process being used to select preferred sites for allocation
1035	Carole Woosey Environment Agency	General Comment			We note that these comments provided previously have been used in the assessment of each site in the consultation document. As such, we have no further comments to add at this time and we look forward to reviewing specific sites that are taken forward as preferred allocations at the next stage of the Local Plan process.	Noted
996	Rachael Graham Persimmon Homes (Lancashire)	Not Stated			Detailed comments on individual sites in Knuzden, Oswaldtwistle and Clayton le Moors and Altham which impact on assessment of housing potential. Overall potential is considered to be reduced from 3437 to 1014 in Knuzden & Oswaldtwistle and 2094 to 525 in Clayton le Moors and Altham. Comments on individual sites are recorded separately.	Noted
548	Jackie Smith	General Comment			Plenty of derelict areas in Great Harwood that should take priority in development.	Noted  This policy aim is set out in policy CS1 and is reflected in the Site Assessment process being used to select preferred sites for allocation
554	Michelle Rawcliffe	General Comment			Brownfield sites, estate regeneration, underused or surplus public sector land, or other authorities providing land should take preference for development before locating on Green Belt land in the Borough.	Agree - no change  These policy aims are set out in policy CS1 and are reflected in the Site Assessment process being used to select preferred sites for allocation
1165	Adam Brennan United Utilities	General Comment			Detailed comments in relation to surface water management and existing combined sewer system. Preference is expressed for brownfield sites in favour of greenfield as the former are likely to result in reduction of surface water discharge to public combined sewer network and associated reduction in risk of sewer flooding, with potential for associated environmental benefits.	Further consideration required  Matters to be considered in developing preferred sites in consultation with UU and LLFA
583	Neil Iredale Homes England	General Comment			Homes England has no land holdings affected by the consultation, however it is keen to continue to work with the Council to help it fulfil its housing growth ambitions.	Noted

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
965	Rachael Graham Persimmon Homes (Lancashire)	General Comment			The viability criterion of the site assessment methodology has used simple categorisation and it is questioned whether this will be updated. The Viability Study undertaken to inform the plan will be almost 5 years old when the examination stage is reached.	Further consideration required  Requirement to update plan viability study to be investigated prior to Publication
845	Mohammed Ahmed Lancashire County Council (Environment Directorate)	General Comment			The School Planning Team and Hyndburn BC have shared detailed information setting out the potential areas of development across the district, enabling visualisation of the relationship of sites to existing primary and secondary schools. At this point not all sites will be taken forward, however it allows understanding how a development, or combination of developments will impact on specific schools. There is currently a significant number of surplus places across the district, however specific schools affected may be operating at their capacity. The School Planning Team will liaise with Hyndburn BC planning officers further as updated information emerges following this consultation, will review and report back the potential impact sites will have across the education provision for Publication stage in 2020.	Further consideration required  Further consultation to be undertaken with LCC Schools Planning as preferred sites for allocation are identified
821	Cheryl Duffy	Not Stated			considers that all brownfield sites would best meet future development requirement in Clayton le Moors/Altham, such as 117, 142, 178, 143, 144, 134, 133, 201 & 172 etc. not any greenfield sites	Noted  This policy aim is set out in policy CS1 and is reflected in the Site Assessment process being used to select preferred sites for allocation
777	Jeanette Lord Allsprings Development LTD	General Comment			Development company has further land in Great Harwood in the vicinity of Allsprings Drive that it would like the Council to assess and consider more fully in meeting growth potential in Great Harwood.	Noted
773	Maureen Kenyon	General Comment			Brownfield sites would contribute to meeting future development needs rather than reducing already limited green spaces. Sites should not result in traffic joining Whalley Road below the Hare and Hounds to the north.	Noted  This policy aim is set out in policy CS1 and is reflected in the Site Assessment process being used to select preferred sites for allocation
763	Tim Bettany-Simmons Canal and River Trust	General Comment		7	Draft site allocations relevant to Canal & River Trust relate to 5 sites in Rishton (Site No's. 38, 92, 102, 104 and 146). CRT would be happy to comment further on specific sites if they are taken forward.	Noted  CRT will be consulted on future stages of the plan

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
762	Tim Bettany-Simmons Canal and River Trust	General Comment		7	Draft site allocations relevant to Canal & River Trust relate to 11 sites in Clayton-le-Moors (Site No's. 20, 49, 60, 95, 133, 144, 172, 201, 210, 211 and 218). CRT would be happy to comment on specific sites further if they are taken forward.	Noted CRT will be consulted on future stages of the plan
761	Tim Bettany-Simmons Canal and River Trust	General Comment		7	Draft site allocations relevant to Canal & River Trust relate to 3 sites in Church (Site No's. 107, 156 and 203). CRT would be happy to comment on specific sites further if they are taken forward.	Noted CRT will be consulted on future stages of the plan
756	Melanie Lindsley The Coal Authority	Support		15	The Coal Authority is pleased to see that as part of the site assessment criteria consideration of coal and mineral workings is included and also minerals safeguarding as part of the process.	Noted
817	Brendan Duffy	Not Stated		42	considers that all brownfield sites would best meet future development requirement in Clayton le Moors/Altham, such as 173, 174, 175, 95, 172, 25, 26, 27, 8, 171, 133, 201, 144, 143, 134, 178, 117 and 142	Noted This policy aim is set out in policy CS1 and is reflected in the Site Assessment process being used to select preferred sites for allocation
751	Judith Horgan Stephen Ward Town Planning & Development Consultants Ltd	General Comment			Request that ABP's site (the former foundry lands) at Heys Street, Great Harwood be included as a potential development site. Present buildings on this site are likely to have to be demolished to facilitate future development on the site.	Disagree - no change The Former Foundry lands site submitted under the Call for Sites process (CFS-049) falls below the site size threshold being considered in the new Local Plan. The Council listed this site, along with others that were screened out from the Site Allocations process, in Appendix 2 of its Site Allocations DPD Reg18 Consultation Draft. This does not preclude the site from coming forward for development but the Council will not consider it further for a formal allocation in the new Local Plan.

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
964	Rachael Graham Persimmon Homes (Lancashire)	Not Stated			The preference for brownfield and/or urban sites should be a more balanced approach, allowing for sustainable sites elsewhere to come forward.	Noted Policy CS1 refers to priority to brownfield sites (para. 3) and objectives of sustainable development (para. 8)
1166	Adam Brennan United Utilities	General Comment			Detailed documents in relation to potential sites in Huncoat Garden Village where growth needs to be planned carefully as the area contains little UU infrastructure. Sets out a need for early dialogue to identify infrastructure requirements and the preparation of infrastructure phasing and delivery strategy (as per separate representations to CS2 - REP ID 909). This should include a co-ordinated approach to clean water and drainage between phases and developers; the approach to surface and foul water drainage to avoid piecemeal approach; inclusion of sustainable drainage systems which include multifunctional benefits; avoidance of ransom situations; and consideration of surface water management (as per separate CS rep). Infrastructure strategy should also reflect required works at waste water pumping station. Easements impact on sites 136 and 220.	Further consideration required Matters to be considered in developing preferred sites in consultation with UU and LLFA
1190	Angela Leigh Natural England	General Comment			NE expects sufficient evidence to be provided through the SA and HRA to ensure that sites of least environmental value are selected through the site selection process. Land allocations should avoid designated sites and landscapes and should consider the direct and indirect effects of development on land within the setting of designated landscapes.	Further consideration required Consider how to complete appropriate landscape assessments in absence of NE input into this.
1184	Angela Leigh Natural England	General Comment			The Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 - Habitats Regulations Assessment. Outcomes of any assessment should inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level and also to provide policies for strategic or cross boundary approaches.	Noted The Council has appointed Land Use Consultants to undertake HRA in conjunction with Sustainability Appraisal work already undertaken on the Local Plan. The HRA will be prepared in advance of the Regulation 19 Publication plan being finished.

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
1183	Angela Leigh Natural England	General Comment			Natural England advises that Hyndburn SSSIs include the West Pennine Moors (WPM) and Harper Clough and Smalley Delph Quarries and these should be highlighted on the Proposals Map for the area so they can be protected and enhanced (where possible). Representations provides more information on the reason for SSSI designation. Key considerations for the WPM are recreational disturbance, hydrological impacts and air quality. Key considerations for Harper Clough and Smalley Delph Quarries are hydrological impacts.	Agree - minor modification  Policy CS15 of the Core Strategy Review provides the policy framework to ensure protection of resources. Policy could be strengthened though to refer to enhancement (where possible). DM18 of the adopted DM DPD provides further relevant development plan policy. The Proposals Map will show SSSI areas.
1182	Angela Leigh Natural England	General Comment			Natural England has published a set of mapped Impact Risk Zones (IRZs) for Sites of Special Scientific Interest (SSSIs). These should be used by LPAs to determine consultation requirements and potential impacts of proposed developments. Further information is on the Natural England website - the IRZs are also available on the Magic Map online tool.	Noted  SSSI IRZs were taken into account in the Stage 2 Site Screening process under criteria 2.2.
978	Rachael Graham Persimmon Homes (Lancashire)	General Comment	3		Site 3 Rhoden Road undevelopable without sites 164 & 75, no link to adopted highway, severely limited by flood risk and mature tree coverage. Revised capacity should be 0.	Further consideration required  Take into account in considering preferred sites for allocation
704	Simon Thomas	Object	3		Strongly objects on the basis of: traffic congestion currently being a problem and that proposed developments will only worsen this issue; noise pollution; environmental ruination; Hyndburn has many vacant houses that could be developed; and forecast population decline. A complete re-think is needed regarding housing need.	Further consideration required  Take into account in considering preferred sites for allocation
979	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	5		Site 5 Land off Brookside Lane/Nook Lane development should be limited to PDL land. Impact on openness of Green Belt to be assessed in line with NPPF para. 145(g)	Further consideration required  Take into account in considering preferred sites for allocation

**Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)**

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
1179	Adam Brennan United Utilities	Not Stated	5		Site is in an area where network is likely to require improvements to accommodate development of this size. Site may be on fringe/limits of water supply/sewerage infrastructure networks with limited capacity to support future growth and could result in need to upsize to support growth. A co-ordinated/phased approach to development/infrastructure provision is needed.	Further consideration required  Matters to be considered in developing preferred sites in consultation with UU and LLFA
848	Alison Whybrow-Parker	Object	6		Object on various grounds including impacts on Green Belt, local amenities/services, traffic and wildlife (including bat population)	Further consideration required  Take into account in considering preferred sites for allocation
997	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	8		site 8 Enfield Quarry former quarry and current landfill site is considered undevelopable. Revised capacity should be 0	Further consideration required  Take into account in considering preferred sites for allocation
1173	Adam Brennan United Utilities	Not Stated	15		UU has records of wastewater network issues in the area and have preference for development to be located in alternative location as a range of sites are being considered at this stage.	Further consideration required  Matters to be considered in developing preferred sites in consultation with UU and LLFA
966	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	15		Site 15 Land west of Moss Lane Knuzden Detailed responses in relation to the specific assessment criteria for the site. In summary, it is considered that there are no known constraints to development of the site.	Further consideration required  Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
952	Ian Smith Historic England	Object	16		<p>Site 16 Coach Road Meadow, Coach Road, Oswaldtwistle</p> <p>This site the boundary of the Church Canalside Conservation Area. The railway Viaduct which runs along the northern edge of this site is a grade II Listed Building. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to their significance.</p> <p>Detailed comments relating to requirements of NPPF and Planning Act Act regarding conserving heritage assets, considering impact of development on their significance and setting and desirability of preserving listed buildings. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of heritage assets and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
980	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	16		<p>Site 16 Coach Road Meadow</p> <p>site not linked to adopted highway. Revised capacity should be 0.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1177	Adam Brennan United Utilities	Not Stated	19		<p>Site is isolated in relation to wastewater network and requires significant assessment to obtain point of connection. Sites on south west of Great Harwood are on fringe/limits of water supply/sewerage infrastructure networks with limited capacity to support future growth and could result in need to upsize to support growth. A co-ordinated/phased approach to development/infrastructure provision is needed.</p>	<p>Further consideration required</p> <p>Matters to be considered in developing preferred sites in consultation with UU and LLFA</p>
550	Jackie Smith	Object	19		<p>Development would spoil an area of beauty.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
967	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	20		Site 20 Land to the north of Burnley Road, adj to Leeds & Liverpool Canal Detailed responses in relation to the specific assessment criteria for the site. In summary, it is considered that there are no known constraints to development of the site.	Further consideration required Take into account in considering preferred sites for allocation
601	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	21		Site 21 includes Local Wildlife Site Number 9, Evidenced Local Wildlife Site Number 21 and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation
1198	Sport England	Object	21		Allocation of this site would need to demonstrate how it complies with the NPPF and Sport England's Playing Fields Policy (i.e. loss or prejudice of use of land meeting one or more of five specific exceptions). The site includes a playing field (or land used as such in the last 10 years). Any allocation would need to be assessed in line with paragraphs 96-97 of the NPPF. The Council's last PPS (2011-2016) omitted this site - the new PPS underway should assess this site and whether there is a need for further pitches to be brought back into use. The site lies adjacent to Mount Carmel RC School so the site could provide facilities for both the school and local community.	Further consideration required The Council's PPS underway will help inform a final decision on this site
734	Gerard Bolton	General Comment	22		Sites within the urban boundary should be seriously considered before any sites in the Green Belt - this and other sites in the urban area highlighted are sufficient to achieve the Core Strategy Growth	Noted
588	Lisa Barnes	Support	22		Supports development for site as brownfield/derelict and would enhance area.	Noted
602	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	22		Site 22 includes Evidenced Local Wildlife Site Number 67 and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
1044	Stuart Booth JWPC Ltd	Support	24		Detailed submission in support of allocation of site 24 Land North of Sandy Lane Accrington for residential purposes. Includes assessment of criteria identified as having red outcomes in the Council's assessment in relation to ecological networks, priority species/habitats, accessibility by public transport - train and concludes that some should be re-categorised as amber and can be suitably mitigated. The site would deliver high quality homes improving the housing offer in the Borough with good access to services in a quality environment and support the strategic objectives of the Core Strategy.	Noted
915	Ian Smith Historic England	Object	24		<p>Site 24 Land north of Sandy Lane</p> <p>Development of this area could impact upon elements which contribute to the Grade II Listed High Riley which lies 490 metres to the east of this site.</p> <p>Detailed comments relating to requirements of NPPF and Listed Building Act regarding conserving heritage assets and considering impact of development on their significance and setting. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See actual rep for full detail</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1146	Philip Vincent-Barwood The PROSPECTS Foundation	Object	24		Objection based on the following grounds: land is Countryside Area designation; intrusion into open countryside; negative visual impacts; access via Sandy Lane raised multiple issues (viability, deliverability, infrastructure, public safety and heritage). Representation also provides information correcting a number of the assessment criteria (11 in all stating that their assessments should be red)	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
916	Ian Smith Historic England	Object	30		<p>Site 30 Perseverance Mill/Lower Grange Mill</p> <p>This site adjoins the boundary of the Accrington Town Centre Conservation Area and the Christ Church Conservation Area. The redevelopment of this site could also impact upon the setting of the Magistrates Court and Police Station and the adjacent Fire Station all of which are Grade II Listed Buildings.</p> <p>Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting.</p> <p>Suggested change that if allocated, plan should ensure that elements which contribute to significance of heritage assets are not harmed.</p> <p>See full rep for details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
981	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	32		<p>site 32 Mill at Dunnyshop</p> <p>Market concerns, site in active use. Revised capacity should be 0.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
922	Ian Smith Historic England	Object	33		<p>Site 33 Wood Street, Alleytroyds, Church</p> <p>This site lies within the Church Canalside Conservation Area. The railway Viaduct which runs through this site is a grade II Listed Building. Several of the buildings on this site including 45 Market Street, the former Conservative Club Market Street, the pair of houses at Railway Sawmill have been identified by the Council as Locally Listed Buildings. Detailed comments relating to requirements of NPPF and Listed Building Act regarding conserving heritage assets, considering impact of development on conservation area.</p> <p>Suggested change that if allocated, the Locally Listed Buildings should be retained and reused and that proposals should ensure that those elements which contribute to the significance of the Conservation Area and the Listed Viaduct are not harmed.</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
953	Ian Smith Historic England	Object	37		<p>Site 37 Stonebridge Mill, Mill St, Oswaldtwistle</p> <p>This site adjoins the boundary of the Rhyddings Conservation Area. Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting.</p> <p>Suggested change that if allocated, the plan should ensure that elements which contribute to significance of the Conservation area are not harmed by development.</p> <p>See full rep for details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1055	Mary Aubrey	Support	38		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
1066	Nigel Aubrey	Support	38		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
559	Jeff Scales	Support	38		Supportive of development on this site., within the existing urban boundary - and prioritisation of brownfield sites	Noted
1077	E Neville	Support	38		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
1088	Kevin Parkinson	Support	38		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
544	David Burns	Support	38		Owner of a substantial part of the site would support some form of development	Noted
724	Peter Wilkinson	Support	39		Site is brownfield land and should be first choice.	Noted

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
603	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	41		Site 41 includes part of Woodnook Vale Local Nature Reserve and Priestly Clough and East Lancashire Railway Biological Heritage Site. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation
725	Peter Wilkinson	Support	41		Site is brownfield land and should be first choice.	Noted
1040	Stuart Booth JWPC Ltd	Support	42		Detailed submission in support of allocation of site 48 Ringstonhalgh Farm Clayton le Moors for residential purposes. Includes assessment of criteria identified as having red or amber outcomes in the Council's assessment in relation to ecological networks, priority species/habitats, accessibility by public transport - train, highways access and Green Belt criterion - merging of settlements. Submission concludes that some should be re-categorised and in majority of cases the constraints can be mitigated. Site is in single ownership and is considered to make weak overall contribution to Green Belt. The site would deliver high quality homes with good access to services in a quality environment and support the strategic objectives of the Core Strategy.	Further consideration required
735	Gerard Bolton	Support	42		Sites within the urban boundary should be seriously considered before any sites in the Green Belt - this and other sites in the urban area highlighted are sufficient to achieve the Core Strategy Growth	Noted
589	Lisa Barnes	Support	42		Supports development for site as brownfield/derelict and would enhance area.	Noted
590	Lisa Barnes	Support	43		Supports development for site as brownfield/derelict and would enhance area.	Noted

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
941	Ian Smith Historic England	Object	44		<p>Site 44 St Lawrence Mill, Mill Street, Great Harwod This site adjoins the boundary of the Great Harwood Conservation Area. Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, the plan should ensure that elements which contribute to significance of the Conservation area are not harmed by development.</p> <p>See full rep for details</p>	<p>Further consideration required Take into account in considering preferred sites for allocation</p>
591	Lisa Barnes	Support	44		<p>Supports development for site as brownfield/derelict and would enhance area.</p>	Noted
917	Ian Smith Historic England	Object	45		<p>Site 45 Black Abbey Street/Abbey Street This site includes 103 Abbey Street which is a Grade II Listed Building. Detailed comments relating to requirements of NPPF and Listed Building Act regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, the building should be retained and reused as part of redevelopment and that proposals should harm elements which contribute to significance of the building.</p> <p>See rep for full details</p>	<p>Further consideration required Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
910	Ian Smith Historic England	Object	46		<p>Site 46 Hillside, Higher Gate Road</p> <p>The Grade II Listed Huncoat War Memorial lies in the Recreation Ground to the north of this site. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to the setting of this memorial.</p> <p>Detailed comments relating to requirements of NPPF and Listed Building Act regarding conserving heritage assets and considering impact of development on their significance and setting. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See actual rep for full detail</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
766	Dan Ingram Barton Willmore	Support	46		<p>Client has land interests at Higher Gate Road and welcomes the identification in the Site Allocations DPD. Any allocation of the site should remain suitably flexible to ensure a greater or lesser number of different mixes and tenures can be provided to meet local needs. A full site assessment in line with the Council's criteria method is given providing further information on the site (attached - to be referenced). Representation concludes that there are no overriding reasons why the site should not be allocated.</p>	Further consideration required
1202	Sport England	Object	47		<p>Allocation of this site would need to demonstrate how it complies with the NPPF (para 96-97) and Sport England's Playing Fields Policy (i.e. loss or prejudice of use of land meeting one or more of five specific exceptions). The site includes a playing field (or land used as such in the last 5 years) - there is currently no reference to this in the site assessment. Any allocation would need to be assessed in line with paragraphs 96-97 of the NPPF. The Council's last PPS (2011-2016) identified this site as having potential for devoting to formal pitch use. Development of the site would likely lead to a total loss - sufficient evidence would be required to demonstrate it is no longer required in the Council's new PPS.</p>	<p>Further consideration required</p> <p>The Council's new PPS will advise on pitch requirements and capacity and help inform a decision on this site.</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
998	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	48		site 48 Ringstonhalgh Farm strategic gap function of site may limit development. Revised capacity should be 100.	Further consideration required Take into account in considering preferred sites for allocation
656	Julia Threlfall-Dayus	Object	48		Objections relating to United Utilities pipeline that intersects the site and information by UU that this rendered the site unsuitable for housing. Also Green Belt land which provides a wildlife corridor, and land near the river is Ancient Meadow Land.	Further consideration required Take into account in considering preferred sites for allocation
651	Bernard Mcanenny	Object	48		Objections relating to potential traffic congestion, increased strain on services in Clayton le Moors that are already overstretched (particularly Clayton Medical Centre), local school is at maximum capacity and site is habitat for many species.	Further consideration required Take into account in considering preferred sites for allocation
1153	N O'Rourke	Object	49		objection to site which is considered wholly unsuitable for development on the following grounds: - local infrastructure could not take 250 dwellings - land is a wildlife haven - Hare and Hounds junction is a sticking point for further development, it cannot take any more traffic and breaches air quality recommendations daily.	Further consideration required Take into account in considering preferred sites for allocation
999	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	49		site 49 Hoghton Barn Farm location not considered sustainable and site not linked to development. Revised capacity should be 0	Further consideration required Take into account in considering preferred sites for allocation
604	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	49		Site 49 includes Ancient and Semi-Natural Woodland, Evidenced Local Wildlife Site Number 37, Evidenced Local Wildlife Site Number 51 and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
930	Ian Smith Historic England	Object	49		<p>Site 49 Houghton Barn Farm The Bridge over Leeds-Liverpool Canal at the southwestern corner of this site is a Grade II Listed Building. Detailed comments relating to requirements of NPPF and the 1990 Act regarding conserving heritage assets, considering impacts of development on the asset and desirability of preserving listed buildings etc. Stage 3 detailed appraisal needs to assess these matters. Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	<p>Further consideration required Take into account in considering preferred sites for allocation</p>
726	Peter Wilkinson	Support	50		Site is brownfield land and should be first choice.	Noted
605	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	50		Site 50 includes Priestly Clough and East Lancashire Railway Biological Heritage Site and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	<p>Further consideration required Take into account in considering preferred sites for allocation</p>
593	Lisa Barnes	Support	52		Supports development for site as brownfield/derelict and would enhance area.	Noted
749	Judith Horgan Stephen Ward Town Planning & Development Consultants Ltd	General Comment	52		Welcome the inclusion of site, however request that housing to be included as a potential proposed use. Costs associated with the site relating to the potential need to divert a brook, coal risk assessment studies and ground remediation works mean that employment/retail uses may be unlikely to be viable.	Agree - make change

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
736	Gerard Bolton	Support	52		Sites within the urban boundary should be seriously considered before any sites in the Green Belt - this and other sites in the urban area highlighted are sufficient to achieve the Core Strategy Growth	Noted
750	Judith Horgan Stephen Ward Town Planning & Development Consultants Ltd	Support	53		Welcome the inclusion of site, however request that mixed use to be included as a potential proposed use to include warehousing/ distribution/ storage as has been previously dismissed. Mixed use would comply with emerging Policy CS4.	Agree - make change
737	Gerard Bolton	Support	53		Sites within the urban boundary should be seriously considered before any sites in the Green Belt - this and other sites in the urban area highlighted are sufficient to achieve the Core Strategy Growth	Noted
594	Lisa Barnes	Support	53		Supports development for site as brownfield/derelict and would enhance area.	Noted
738	Gerard Bolton	Support	55		Sites within the urban boundary should be seriously considered before any sites in the Green Belt - this and other sites in the urban area highlighted are sufficient to achieve the Core Strategy Growth	Noted
592	Lisa Barnes	Support	55		Supports development for site as brownfield/derelict and would enhance area.	Noted
942	Ian Smith Historic England	Object	55		<p>Site 55 land to north of Britannia Street This site adjoins the boundary of the Great Harwood Conservation Area. Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, the plan should ensure that elements which contribute to significance of the Conservation area are not harmed by development.</p> <p>See full rep for details</p>	<p>Further consideration required Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
850	Alison Whybrow-Parker	Object	56		Object on various grounds including impacts on Green Belt, local amenities/services, traffic and wildlife (including bat population)	Further consideration required Take into account in considering preferred sites for allocation
1000	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	56		site 56 land off Whalley Road site may constitute strategic gap. Revised capacity should be 0	Further consideration required Take into account in considering preferred sites for allocation
714	John Hindle	Object	56		Objections relating to Whalley Road can't cope with present volume of traffic, site is Green Belt and potential flooding issues around the Hyndburn Bridge pub.	Further consideration required Take into account in considering preferred sites for allocation
824	Darren Muir Cass Associates	Support	56		<p>detailed representation of support for removal of site 56 Land at Whalley Road Clayton le Moors from the Green Belt and for its allocation for housing. Main points in support:</p> <ul style="list-style-type: none"> <li>- the site is an opportunity to meet identified housing need</li> <li>- site is surrounded by housing, urban infrastructure, golf club, cricket club and road network</li> <li>- the allocation would have no significant impact on purposes of including land in Green Belt</li> <li>- encroachment into countryside applies to any location at urban edge</li> <li>- the site is a highly sustainable location with accessible to everyday services and facilities and sustainable transport options with the opportunity to improve</li> <li>- there are no constraints to prevent development of the site; matters which need further investigation are not considered impediments, such as ecology, access and capacity of utilities.</li> </ul> <p>See report attached to representation for full details</p>	Noted
545	Geoff Knowles	General Comment	56		Vehicle access will be a problem (only access via Rushy Field) and high power cables go across the area.	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
954	Ian Smith Historic England	Object	57		<p>Site 57 Land north of Blackburn Road</p> <p>This site lies adjacent to and partly within the Church Canalside Conservation Area and its development could also affect the setting of the Grade II Listed Lower Aspen Farmhouse, Aspen Cottage and the Canal Bridge to the east. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to their significance.</p> <p>Detailed comments relating to requirements of NPPF and Planning Act Act regarding conserving heritage assets, considering impact of development on their significance and setting and desirability of preserving listed buildings. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of heritage assets and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
982	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	57		<p>site 57 land north of Blackburn Road</p> <p>net area should be reduced to consider impact on allotments and existing uses. Single access point limits deliverable numbers. Revised capacity should be 250.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
823	Darren Muir Cass Associates	Support	57		<p>detailed representation of support for removal of site 57 Land North of Blackburn Road from the Green Belt and for its allocation for housing. Main points in support:</p> <ul style="list-style-type: none"> <li>- the site is an opportunity to meet identified housing need</li> <li>- site is surrounded by housing, urban infrastructure, golf club, cricket club and road network</li> <li>- the allocation would have no significant impact on purposes of including land in Green Belt</li> <li>- encroachment into countryside applies to any location at urban edge</li> <li>- the site is a highly sustainable location with accessible to everyday services and facilities and sustainable transport options with the opportunity to improve</li> <li>- there are no constraints to prevent development of the site; matters which need further investigation are not considered impediments, such as ecology, access and capacity of utilities.</li> </ul> <p>See report attached to representation for full details</p>	Noted
1124	Joshua Hellowell PWA Planning	Support	57		<p>Significant weight should be given to the significant contribution that site 57 could play in local housing supply. Delivery of dwellings could take place without unacceptable impacts or compromising the functionality of the Green Belt (nor conflict significantly with the purposes of Green Belt). The site boundary could be amended or reduced to take account of sensitive ecological receptors identified. Landscape impacts would be minimal.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
911	Ian Smith Historic England	Object	59		<p>Site 59 Land South of Burnley Lane</p> <p>The Grade II Listed Huncoat War Memorial lies in the Recreation Ground to the west of this site. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to the setting of this memorial.</p> <p>Detailed comments relating to requirements of NPPF and Listed Building Act regarding conserving heritage assets and considering impact of development on their significance and setting. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Detailed changes suggested relating: a) to need to carry out the appraisal at stage 3 as set out above; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See actual rep for full detail</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
606	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	60		<p>Site 60 includes Altham Clough Wood Biological Heritage Site, Ancient and Semi-Natural Woodland and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
547	Yvonne Cannings	Object	63		<p>Objections relating to Green Belt, bat presence, other wildlife/flora, high pressure gas main running through field, poor vehicular access and increased traffic to an already congested area.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
586	Lisa Barnes	Object	63		<p>Objections relating to Green Belt land provides beauty and wildlife, Great Harwood needs to be kept as a market town, services already overstretched and area liable to flooding.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
775	Jeanette Lord Allsprings Development LTD	Support	63		<p>Support for site 63 which lends itself to sensitive development of affordable bungalows for ageing and disabled population which could in turn release more family homes.</p>	<p>Noted</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
607	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	63		Site 63 includes Allsprings Drive Fields Biological Heritage Site and lowland fen which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation
584	Kelly Barlow	Object	63		Objection relating to Green Belt land, site is marshland and too wet, increase in traffic and noise, potential rise in crime, loss of views, schools and health centres already overstretched struggling as serving at maximum capacity.	Further consideration required Take into account in considering preferred sites for allocation
553	Michelle Rawcliffe	Object	63		Objections relating to Green Belt land, extra congestion on local roads and destruction of the character of the area. The area is one of natural beauty and supports a rich diverse habitat for local wildlife. Impact on views from properties nearby and market value of homes.	Further consideration required Take into account in considering preferred sites for allocation
641	Mark Hope	Object	63		Objection to site as it is within the Green Belt. Also: 3A.8 - mature protected trees provide environmental and ecological benefits and visual amenity for residents; 3A.13 - contiguous to lowland fell so site should be designated S41 - also bats seen frequently flying, birds, waterfowl, deer; 3C.1 - requires secondary access - where from; 3C.2 - route to Clayton-le-Moors already highly congested, local residents divert through Rishton increasing congestion and air pollution there	Further consideration required Take into account in considering preferred sites for allocation
649	Samir and D Ramathan	Object	63		Objections relating to Green Belt land which provides open space for nearby residents and is also the site is a haven for wildlife.	Further consideration required Take into account in considering preferred sites for allocation
1078	E Neville	Support	66		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
1067	Nigel Aubrey	Support	66		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
1130	Warren Melia	Not Stated	66		Concerns are raised in relation to development of this site based on potential highways impacts (specifically on school parent drop-offs) and ecological impacts now that the site is returning to nature.	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
560	Jeff Scales	Support	66		Supportive of development on this site., within the existing urban boundary - and prioritisation of brownfield sites	Noted
1089	Kevin Parkinson	Support	66		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected. Albert Mill derelict site should be first priority.	Noted
1056	Mary Aubrey	Support	66		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
1132	Warren Melia	General Comment	68		Development of this site should consider adopting of the un-adopted road off Henry Street and connecting it up with the bottom of Petre Crescent / Meadowhead Drive. This would benefit the proposed site 92 at Shearbrook Farm as well.	Further consideration required Take into account in considering preferred sites for allocation
562	Jeff Scales	Support	68		Open to housing development on the site, although would also like to see provision of a greenspace if development of this specific site goes ahead.	Noted
1057	Mary Aubrey	Support	69		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected. Albert Mill site suggested as first priority.	Noted
561	Jeff Scales	Support	69		Supportive of development on this site., within the existing urban boundary - and prioritisation of brownfield sites	Noted
1068	Nigel Aubrey	Support	69		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected. Albert Mill site suggested as first priority.	Noted
1079	E Neville	Support	69		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected. Albert Mill site suggested as first priority.	Noted

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
1090	Kevin Parkinson	Support	69		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
1133	Warren Melia	General Comment	69		Development of this site should join up Walmsley Road and Walmsley Avenue. A one-way system should also be introduced down Mary Street (off the High Street) to avoid traffic turning onto High Street from Mary Street which is a hazardous junction.	Further consideration required Take into account in considering preferred sites for allocation
648	Robert Barnes Planning Prospects Ltd	Support	74		Indicative capacities should not be carried forward into a site allocation as may be seen as overly restrictive - the actual capacity of the site is considered greater than stated. Site is 1 of just 2 sites in Oswaldtwistle that has no significant negative outcomes. Representation is from the site agent and provides further detailed information against numerous of the site assessment criteria to clarify matters: existing use of the site; proposed uses; efficient use of land; current condition of the site; visual impact / landscape character; heritage assets; ecological networks; tree/woodlands/habitats; priority species/habitats; highways access; availability and achievability.	Further consideration required
955	Ian Smith Historic England	Object	74		<p>Site 74 Land South of Rhyddings Street and north of Stone Bridge The northern part of this site lies within the Rhyddings Conservation Area.</p> <p>Detailed comments relating to requirements of NPPF and Listed Building Act regarding conserving heritage assets, considering impacts of development on conservation area and listed buildings and desirability of preserving listed buildings. Suggest that buildings which make a positive contribution to the conservation area should be retained.</p> <p>Suggested change that as part of stage 3 appraisal: a) identify and retain buildings which make positive contribution to conservation area; and b) proposals should ensure that those elements which contribute to the significance of the Conservation Area are not harmed.</p> <p>See rep for full details</p>	Further consideration required Take into account in considering preferred sites for allocation
705	Simon Thomas	Object	75		Strongly objects on the basis of: traffic congestion currently being a problem and that proposed developments will only worsen this issue; noise pollution; environmental ruination; Hyndburn has many vacant houses that could be developed; and forecast population decline. A complete re-think is needed regarding housing need.	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
983	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	76		Former Chemical works, Brookside Lane/Nook Lane development should be limited to PDL land. Impact on openness of Green Belt to be assessed in line with NPPF para. 145(g)	Further consideration required Take into account in considering preferred sites for allocation
1180	Adam Brennan United Utilities	General Comment	76		Site is in an area where network is likely to require improvements to accommodate development of this size. Site may be on fringe/limits of water supply/sewerage infrastructure networks with limited capacity to support future growth and could result in need to upsize to support growth. A co-ordinated/phased approach to development/infrastructure provision is needed.	Further consideration required Matters to be considered in developing preferred sites in consultation with UU and LLFA
968	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	77		Site 77, 7 Garsden Ave Knuzden site is remote from highway and capacity should be 0	Further consideration required Take into account in considering preferred sites for allocation
912	Ian Smith Historic England	Object	78		<p>Site 78 Land south east of Moorfield Avenue Huncoat Hall and the attached barn to the east of this site are Grade II Listed Buildings. The loss of this currently undeveloped area and its subsequent development could harm elements which contribute to their significance.</p> <p>Detailed comments relating to requirements of NPPF and Listed Building Act regarding conserving heritage assets and considering impact of development on their significance and setting. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See actual rep for full detail</p>	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
913	Ian Smith Historic England	Object	79		<p>Land south east of Moorfield Avenue, adjoining A56 Huncoat Hall and the attached barn to the east of this site are Grade II Listed Buildings. The loss of this currently undeveloped area and its subsequent development could harm elements which contribute to their significance.</p> <p>Detailed comments relating to requirements of NPPF and Listed Building Act regarding conserving heritage assets and considering impact of development on their significance and setting. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See actual rep for full detail</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
840	Warren Hilton Highways England	General Comment	80		<p>Highways England is aware that asbestos may be present in Site 80 (waste tip associated with the former Huncoat Power Station site, and adjacent to M65) that will require careful assessment and subsequent management.</p>	<p>Further consideration required</p> <p>Further consultation to take place with Highways England and further evidence on Transport matters to be undertaken prior to considering preferred sites for allocation</p>
901	Daniel Owen RPS Consulting Services Ltd	General Comment	80		<p>The four stage process appears logical and sufficiently robust to inform site allocations. There are specific concerns about the assessment outcomes in relation to site 80 Former Huncoat Power Station. The site should be regarded as previously developed. Development for residential and/or mixed use has potential to make significant positive impact on Huncoat and Hyndburn and future development requirements.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
608	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	80		<p>Site 80 includes Evidenced Local Wildlife Site Number 32, Evidenced Local Wildlife Site Number 33, and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
902	Daniel Owen RPS Consulting Services Ltd	Not Stated	80		<p>Comments relate to the assessment of site 80 Former Huncoat power station.</p> <ul style="list-style-type: none"> <li>- the whole of the site should be regarded as previously developed</li> <li>- the main part of the site is not in Green Belt</li> <li>- refutes the statement that this is a 'former' brownfield site that has been extensively colonised. Presence of vegetation does not make it a greenfield site.</li> </ul> <p>The majority of assessment outcomes are agreed with but several require adjustment as set out in the representation (contaminated land, trees/woodland, priority species, accessibility to centres, highways access, schools infrastructure, regeneration, developer interest, ownership constraints).</p> <p>Furtehr information is being gathered for a variety of factors which will be shared with the council.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
635	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	82		<p>The land to west of Brookside includes Brookside Reservoirs Local Wildlife Site (Evidenced), deciduous woodland which is listed on the Priority Habitat Inventory, and a larger area of broadleaved woodland planted through ELWOOD. Not listed under SA16 for the site therefore may not have been taken into account. Lancashire Wildlife Trust objects to the allocation of the Local Wildlife Site, Priority Habitat Inventory woodland and the ELWOOD funded plantations within the development footprint unless they are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy and net gains in biodiversity/nature must be applied.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
956	Ian Smith Historic England	Object	82		<p>Site 82 Land to west of Brookside Knuzden Hall and Knuzden Hall Farmhouse 300 metres to the north of this site are Grade II Listed Buildings. The development of this area could harm elements which contribute to their significance.</p> <p>Detailed comments relating to requirements of NPPF and Planning Act Act regarding conserving heritage assets, considering impact of development on their significance and setting and desirability of preserving listed buildings. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of the heritage assets and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
609	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	82		<p>Site 82 land to west of Brookside includes Brookside Reservoirs, which are known to be of ecological interest, deciduous woodland which is listed on the Priority Habitat Inventory, and a larger area of broadleaved woodland planted through ELWOOD, the East Lancashire Woodland Project, with funding through the East Lancashire Partnership and the Forestry Commission. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1181	Adam Brennan United Utilities	Not Stated	82		<p>Site is in an area where network is likely to require improvements to accommodate development of this size. Site may be on fringe/limits of water supply/sewerage infrastructure networks with limited capacity to support future growth and could result in need to upsize to support growth. A co-ordinated/phased approach to development/infrastructure provision is needed.</p>	<p>Further consideration required</p> <p>Matters to be considered in developing preferred sites in consultation with UU and LLFA</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
984	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	82		site 82 Land to west of Brookside Site remote from highway, not assessed for contribution to Green Belt; removal of site would necessitate significant and unnecessary changes to boundary. Revised capacity should be 0.	Further consideration required Take into account in considering preferred sites for allocation
578	Wood and National Grid	General Comment	82		Proposed site is crossed by a National Grid high voltage electricity transmission overhead line - plan provided and advice on statutory clearances and development near overhead lines.	Further consideration required Take into account in considering preferred sites for allocation
863	Ann Schofield	Object	83		Objects to site 83 on grounds which can be summarised as: - Residents were previously advised that access to Lynwood Road could not be widened due to proximity of services which would be costly to change. - site is rear of bungalows which are opposite the school; - development would exacerbate traffic problems especially at school time; - Access onto Lynwood Road would be a problem; Additional traffic would be a danger to children and aggravate residents who have problems with school parking.	Further consideration required Take into account in considering preferred sites for allocation
1111	Daniel Taylor	Support	84		Supports release of this land as it provides a suitable site for aspirational and desirable residential development	Noted
551	Jackie Smith	Object	84		Development would spoil an area of beauty.	Further consideration required Take into account in considering preferred sites for allocation
1144	Jeffrey Ellis	Object	84		Access to/from the site would be dangerous due to poor site lines (either from Hindle Fold Lane or a new road adjacent to the Dog and Otter). Congestion already severe to the M65. Junior and secondary schools are at capacity. The land is Green Belt. The field contains a large soak away for surface water from adjacent properties, development would exacerbate flooding problems downstream.	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
827	Judith Douglas Judith Douglas Town Planning Limited	Support	84		<p>Site is suitable for high quality aspirational housing in an attractive setting. Site is likely to deliver affordable housing due to viability. Criteria 3C.1 Highways is scored red due to Hindle Fold Lane being unsuitable for additional traffic. However site 84 could be developed alongside 85 as its in the same ownership, enabling access from Tan House Lane.</p> <p>A detailed supporting statement is attached to the representation providing an independent site assessment setting out factors of planning and development significance: developable area, site is not within a Conservation Area, has no listed buildings or other heritage assets within or in close proximity to the site. No nature conservation designations and no significant wildlife value. Site is entirely within Flood Risk Zone 1, no known contamination affecting the site. In a sustainable location to with good access to a wide range of local services and vehicular access would be readily available to the site off Hindle Fold Lane and Upper Cliffe.</p>	Noted
1145	Jeffrey Ellis	Object	85		<p>Access to/from the site would be dangerous due to poor site lines (either from Hindle Fold Lane or a new road adjacent to the Dog and Otter). Congestion already severe to the M65. Junior and secondary schools are at capacity. The land is Green Belt. The field contains a large soak away for surface water from adjacent properties, development would exacerbate flooding problems downstream.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1112	Daniel Taylor	Support	85		<p>Supports release of this land as it provides a suitable site for aspirational and desirable residential development</p>	Noted
828	Judith Douglas Judith Douglas Town Planning Limited	Support	85		<p>Site is suitable for high quality aspirational housing in an attractive setting. Site is likely to deliver affordable housing due to viability. Access to site 85 from Tan House Lane could also be used to access site 84 in conjunction as its in the same ownership.</p> <p>A detailed supporting statement is attached to the representation providing an independent site assessment setting out factors of planning and development significance. Support comments relating to site developable area of approx 4.75ha., the site is visually contained by existing development. The site is not located within an AQMA or area of poor air quality. Although it lies within the Green Belt, assessment revealed the site only made a 'moderate' contribution to the purposes of the Green Belt.</p>	Noted

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
1154	Allan Humphreys	General Comment	85		detailed comments clarifying ownership of the site	Further consideration required Consider whether comments impact upon assessment of availability
552	Jackie Smith	Object	85		Development would spoil an area of beauty.	Further consideration required Take into account in considering preferred sites for allocation
543	Stephen Ireland	Object	87		Objections relating to the site being identified as Public Open Space and an ecological compensation area in the recent planning application for Great Harwood Rovers (plan provided). The site is within the Green Belt, and concerns also raised about car parking and potential traffic problems.	Further consideration required Take into account in considering preferred sites for allocation
650	Samir and D Ramathan	Object	87		Objections relating to Green Belt land which provides open space for nearby residents and is also the site is a haven for wildlife.	Further consideration required Take into account in considering preferred sites for allocation
587	Lisa Barnes	Object	87		Objections relating to Green Belt land provides beauty and wildlife, Great Harwood needs to be kept as a market town, services already overstretched and area liable to flooding.	Further consideration required Take into account in considering preferred sites for allocation
610	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	87		Site 87 includes Allsprings Drive Fields Biological Heritage Site and lowland fen which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation
776	Jeanette Lord Allsprings Development LTD	Support	87		Support for site 87 which lends itself to sensitive development of affordable bungalows for ageing and disabled population which could in turn release more family homes.	Noted

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
826	Darren Muir Cass Associates	Support	87		<p>detailed representation of support for removal of site 87 Land at Harwood Lane Great Harwood from the Green Belt and for its allocation for housing. Main points in support:</p> <ul style="list-style-type: none"> <li>- the site is an opportunity to meet identified housing need</li> <li>- site is surrounded by housing, urban infrastructure, golf club, cricket club and road network</li> <li>- the allocation would have no significant impact on purposes of including land in Green Belt</li> <li>- encroachment into countryside applies to any location at urban edge</li> <li>- the site is a highly sustainable location with accessible to everyday services and facilities and sustainable transport options with the opportunity to improve</li> <li>- there are no constraints to prevent development of the site; matters which need further investigation are not considered impediments, such as ecology, access and capacity of utilities.</li> </ul> <p>See report attached to representation for full details</p>	Noted
746	Nick Pleasant NJL Consulting	General Comment	88		<p>The emerging plan should recognise the future retail and mixed use potential at The Peel Centre - it currently states only mixed use in the Site Assessment for the site, despite the Core Strategy statements on the centre being a retail site. The documents should be fully aligned, a boundary should be set for the Peel Centre against which a policy approach is provided limiting detailed assessments for future applications (in line with comments submitted to the Core Strategy document)</p>	Agree - make change
945	Ian Smith Historic England	Object	88		<p>Site 88 The Peel Centre Whitebirk Drive Whitebirk Moss Farmhouse and Whitebirk North Farmhouse to the east of this site are Grade II Listed Buildings. Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, plan should ensure that elements which contribute to significance of heritage assets are not harmed.</p> <p>See full rep for details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
835	Warren Hilton Highways England	General Comment	88		Concern of multiple sites proposed around and on the approaches to J6 - likely access arrangements onto the roundabout (sites 106, 169, 88, 105, 228, 229 and 230) and the possibility that multiple sites beyond these could share the same connection onto the roundabout, which already has five arms (two carrying M65 exit slips).	Further consideration required  Further consultation to take place with Highways England and further evidence on Transport matters to be undertaken prior to considering preferred sites for allocation
611	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	90		Site 90 contains lowland fen which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required  Take into account in considering preferred sites for allocation
1049	David Morris EC Squared (NW) Ltd	Support	92		support for designation of Site 92 at Shear Brook farm for residential purposes. It is considered sustainable, adjacent to existing settlement, accessible, close to public transport and other services and is a logical rounding off/extension of existing settlement. Current contribution to Green Belt is weak. Existing woodland area can be protected. Welcomes Council's assessment of the site and provides own information/ assessment and indicative masterplan to demonstrate achievability, suitability and deliverability of site which will contribute to Borough's housing requirement.	Noted
1134	Warren Melia	Not Stated	92		This site is as far from anywhere in Rishton as you could possibly get. Existing access is limited to canal-side farm track. If development was to take place, consider a new pedestrian/cycle bridge over the canal. Site should also be developed in conjunction with site 68 to give direct access up Henry Street.	Further consideration required  Take into account in considering preferred sites for allocation
716	Graham Davidson	Object	92		Strongly disagree with any more development in this area as it is has tenanted for almost 40 years by my family, the premises has strong family ties and provides a home for 2 people; the holding is farmed; horses are bred and kept here; there is a registered livestock production unit for Beef and Lamb; value has been added over the years to make it a working smallholding; significant wildlife and flora within the area (protected area); already traffic problems accessing Station Rd and Walmsley Avenue; significant shortage of schools, doctors and dentists; and identified as sight of beauty along the canal which would be a significant loss to the community.	Further consideration required  Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
563	Jeff Scales	Object	92		Concern regarding narrow single access to site and potential extra traffic on Petre Crescent estate which would be caused.	Further consideration required Take into account in considering preferred sites for allocation
1168	Adam Brennan United Utilities	Not Stated	93		Site includes Great Harwood Service Reservoir and asset protection measures will be required. Detailed comments regarding impacts of development on: the asset; water quality; water transportation network; vehicular access to the asset; or on customers.	Further consideration required Further information required to establish UU requirements
549	Jackie Smith	Object	93		Site is haven for wildlife and any development would harm such species	Further consideration required Take into account in considering preferred sites for allocation
825	Darren Muir Cass Associates	Support	93		<p>detailed representation of support for removal of site 93 Land Old Blackburn Old Road Great Harwood from the Green Belt and for its allocation for housing. Main points in support:</p> <ul style="list-style-type: none"> <li>- the site is an opportunity to meet identified housing need</li> <li>- site is surrounded by housing, urban infrastructure, golf club, cricket club and road network</li> <li>- the allocation would have no significant impact on purposes of including land in Green Belt</li> <li>- encroachment into countryside applies to any location at urban edge</li> <li>- the site is a highly sustainable location with accessible to everyday services and facilities and sustainable transport options with the opportunity to improve</li> <li>- there are no constraints to prevent development of the site; matters which need further investigation are not considered impediments, such as ecology, access and capacity of utilities.</li> </ul> <p>See report attached to representation for full details</p>	Noted
612	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	94		Site 94 includes Evidenced Local Wildlife Site Number 50 and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation

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Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
918	Ian Smith Historic England	Object	94		<p>Site 94 Broad Oak Industrial Estate This site adjoins the boundary of the Christ Church Conservation Area Detailed comments relating to requirements of NPPF and Listed Building Act regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, plan should ensure that elements which contribute to significance of heritage assets are not harmed.</p> <p>See full rep for details</p>	<p>Further consideration required Take into account in considering preferred sites for allocation</p>
571	S Walsh	Object	94		<p>Objects as perceives unacceptable adverse impact on the character and appearance of this area of countryside.</p>	<p>Further consideration required Take into account in considering preferred sites for allocation</p>
1098	Christopher McGough McGough Planning Consultants Ltd	Not Stated	94		<p>Detailed response which generally welcomes most of the site assessment conclusions in ealtion to site 94 Broad Oak but raises specific concerns at the outcomes for specific criteria for which further information is provided: Ribston welcomes most of the site appraisal's conclusions; however, they have a concerns about a number of the identified criteria. These are set out below (using the Council's reference for each of the relevant criteria):</p> <ul style="list-style-type: none"> <li>-3A.2 Current condition of site</li> <li>-3A.4 Flood risk (fluvial)</li> <li>-3A.5 Flood Risk (Other) -</li> <li>-3A.10 Heritage assets</li> <li>-3A.11 Ecological Networks</li> <li>-3A.12 Trees / woodlands / hedgerows</li> <li>-3A.13 Priority species / habitats</li> <li>-3C.5 Open space/GI network .</li> <li>-3C.4 Drainage</li> <li>-3D.3 Hazardous installations</li> <li>-3D.9 Existing employment sites</li> <li>-3E.4 Ownership constraints</li> </ul>	<p>Further consideration required</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
931	Ian Smith Historic England	Object	95		<p>Site 95 Land South of Burnley Road Altham Moor Side House to the east of this site is a Grade II Listed Building. Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, plan should ensure that elements which contribute to significance of heritage assets are not harmed.</p> <p>See full rep for details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1002	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	95		<p>Site 95 Land South of Burnley Road Altham Active travellers site. Revised capacity should be 0.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
957	Ian Smith Historic England	Object	96		<p>Site 96 Land to the rear and side of Broadfield Rough Heys Farmhouse and barns and Rough Heys Farm Cottage to the east of this site are Grade II Listed Buildings. The loss of this largely-undeveloped area and its subsequent development could harm elements which contribute to their significance.</p> <p>Detailed comments relating to requirements of NPPF and Planning Act Act regarding conserving heritage assets, considering impact of development on their significance and setting and desirability of preserving listed buildings. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of the heritage assets and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
1199	Sport England	Object	97		Allocation of this site would need to demonstrate how it complies with the NPPF (para 96-97) and Sport England's Playing Fields Policy (i.e. loss or prejudice of use of land meeting one or more of five specific exceptions). The site lies close to Accrington Cricket Club site. The cricket club site also provides football, a pavilion and changing facilities. Any development on site 97 could prejudice the sports that take place at the cricket club.	Further consideration required  Clarify with SE how does the Highams Playing Field proposals impact on these comments?
613	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	98		Site 98 includes Local Wildlife Site Number 23, Evidenced Local Wildlife Site Number 31, and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required  Take into account in considering preferred sites for allocation
932	Ian Smith Historic England	Object	100		Site 100 Land between Blackburn Rd, Dunkenhalgh Way and M65 There is a Listed grotto or plant house in garden of Henfield House to the north of this site. Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, plan should ensure that elements which contribute to significance of heritage assets are not harmed.  See full rep for details	Further consideration required  Take into account in considering preferred sites for allocation
728	D Mercer Residents of Blackburn Road	Object	100		Objections relating to added air/noise pollution, increased traffic and meadow supports a host of wildlife (including bats). Ensure all alternative actions have been plores including brownfield land and intensification of existing sites.	Further consideration required  Take into account in considering preferred sites for allocation
1003	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	100		site 100 Land between Blackburn Road, Dunkenhalgh Way and M65 Noise constraints significantly constrain development. Revised capacity should be 30.	Further consideration required  Take into account in considering preferred sites for allocation

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Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
1004	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	101		Site 101 Land north of Blackburn Road, adjoining Hyndburn Brook Mature trees constrain delivery, site may be a strategic gap and is unrelated residential development. Revised capacity should be 0.	Further consideration required Take into account in considering preferred sites for allocation
780	Paul Worswick	Object	101		Object to any development on grounds of narrowing the Green Belt gap between Clayton-le-Moors and Rishton. Topography problematic and issue regarding flood risk.	Further consideration required Take into account in considering preferred sites for allocation
933	Ian Smith Historic England	Object	101		Site 101 Land north of Blackburn Road, adjoining Hyndburn Brook Holt Mill Cottages and Holt Mill House to the west of this site are Grade II Listed Buildings. The development of this area could also, potentially, impact upon the setting of the Grade II Listed Dunkenhalgh Hotel and its stable block to the south. Detailed comments relating to requirements of NPPF and the 1990 Act regarding conserving heritage assets, considering impacts of development on the asset and desirability of preserving listed buildings etc. Stage 3 detailed appraisal needs to assess these matters. Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).  See rep for full details	Further consideration required Take into account in considering preferred sites for allocation
614	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	102		Site 102 includes Shaw Brook and Mill Wood Biological Heritage Site, deciduous woodland and lowland dry acid grassland, both of which are listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation
1133	Warren Melia	Not Stated	102		Concerns raised over safe access/egress to the site. Junction of Wharf Street/Derby Street onto Hermitage street highlighted as dangerous. Active traffic management required particularly in context of recent Parker Street development on the other side.	Further consideration required Take into account in considering preferred sites for allocation

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Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
636	Airey	Object	102		Objections relating to potential traffic problems, added air and noise pollution, ecology issues, flooding risk and development on Green Belt when alternative sites are readily available.	Further consideration required Take into account in considering preferred sites for allocation
1128	Lynne & Dennis Webster	Object	102		Objection based on noise and air pollution from traffic, impact on ecology, increased risk of flooding, and use of a Green Belt site when previously developed land is readily available.	Further consideration required Take into account in considering preferred sites for allocation
1113	Christopher Pollard	Object	103		Object due to increased traffic, lack of facilities to support population increase, visual and ecological impact, disruption of building work, reducing size of Cut Wood Park, and impact on open ended cul-de-sacs (Derwent, Ulverston, Windermere, Grasmere).	Further consideration required Take into account in considering preferred sites for allocation
732	S Kershaw	Object	103		Objections relating to current infrastructure will struggle to cope, services are already overstretched (particularly doctors), green belt land should be protected and wildlife is abundant in this area, noise and air pollution.	Further consideration required Take into account in considering preferred sites for allocation
729	P Smithson	Object	103		Development of site would have a disastrous effect on the habitat of various species in this area of Green Belt land (including bats). Difficulties already exist in getting doctors appointments, increased population will cause greater problems. Significant access problems on Cut Lane and Somerset Road (and child safety concerns if widened).	Further consideration required Take into account in considering preferred sites for allocation
637	Airey	Object	103		Objections relating to potential traffic problems, added air and noise pollution, ecology issues, flooding risk and development on Green Belt when alternative sites are readily available. Also Cut lane (a private footpath) access would have to be made wider for development traffic resulting in loss of parkland and danger to children using the play area.	Further consideration required Take into account in considering preferred sites for allocation
1093	Kevin Parkinson	Object	103		Object to development of site 103 (Cut Lane) and disagrees with many aspects of the Council's assessment. Main issues can be summarised: - current services under pressure - unsuitability of Cut Lane for access and associated impacts on recreational users, park, trees, wildlife - increased traffic in Rishton - need to address current peak traffic congestion problems	Further consideration required Take into account in considering preferred sites for allocation
546	Emma Clark	Object	103		Significant impact on Green Belt and wildlife which inhabit in the area. Concern over significant increase in traffic (adjacent to a green flag park).	Further consideration required Take into account in considering preferred sites for allocation

**Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)**

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
717	Helen Croasdale	Object	103		Objects in favour of numerous industrial and brownfield sites being available - focus should be on regenerating rather than encroaching countryside and agricultural land. The number of dwellings proposed (389) will impact upon small town character and not sufficient infrastructure to cope. Approach roads already choked with parked cars. Access not possible without impacting on the local park. Please do not allow us to lost the limited green space that surrounds our town.	Further consideration required Take into account in considering preferred sites for allocation
542	Elaine and David Stanton	Object	103		Objections relating to Green Belt land, environmental protection, access to countryside, impact on Cutwood Park (access) and existing Barratts estate, potential traffic issues, drainage/flood impacts.	Further consideration required Take into account in considering preferred sites for allocation
1059	Mary Aubrey	Object	103		Object to development of site 103 (Cut Lane) and disagrees with many aspects of the Council's assessment. Main issues can be summarised: - current services under pressure - unsuitability of Cut Lane for access and associated impacts on recreational users, park, trees, wildlife - increased traffic in Rishton - need to address current peak traffic congestion problems	Further consideration required Take into account in considering preferred sites for allocation
564	Jeff Scales	Object	103		Objection regarding highway capacity issues, narrow access along Cut Lane, heavily used by walkers. Tight junction around park entrance with poor visibility	Further consideration required Take into account in considering preferred sites for allocation
677	Kathleen Norris	Object	103		Objections relating to development on the Green Belt and Harwood Road is already subject to heavy traffic and would only worsen with new development.	Further consideration required Take into account in considering preferred sites for allocation
1070	Nigel Aubrey	Object	103		Object to development of site 103 (Cut Lane) and disagrees with many aspects of the Council's assessment. Main issues can be summarised: - current services under pressure - unsuitability of Cut Lane for access and associated impacts on recreational users, park, trees, wildlife - increased traffic in Rishton - need to address current peak traffic congestion problems	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
959	Ian Smith Historic England	Object	103		<p>Site 103 Land to the north east of Cut Lane The Bridge over Leeds-Liverpool Canal to the north is a Grade II Listed Building. The loss of this currently undeveloped area and its subsequent development could harm elements which contribute to its significance.</p> <p>Detailed comments relating to requirements of NPPF and Planning Act Act regarding conserving heritage assets, considering impact of development on their significance and setting and desirability of preserving listed buildings. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of the heritage assets and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1082	E Neville	Object	103		<p>Object to development of site 103 (Cut Lane) and disagrees with many aspects of the Council's assessment. Main issues can be summarised:</p> <ul style="list-style-type: none"> <li>- current services under pressure</li> <li>- unsuitability of Cut Lane for access and associated impacts on recreational users, park, trees, wildlife</li> <li>- increased traffic in Rishton</li> <li>- need to address current peak traffic congestion problems</li> </ul>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1143	Kerry Pollard	Object	103		<p>Objection based on the following concerns: increased traffic into Rishton, lack of facilities in the town, visual impact and impact on ecology, reducing of appeal of living in the area, reduction of size of Cut Wood Park, and potential impact on open ended cul-de-sacs on Derwent, Ulverston, Windermere and Grasmere.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
663	Jacci Beesley	Object	103		Concern over current traffic congestion in Rishton along Harwood Road and Blackburn Road and associated pollution, which will only worsen with additional housing development. Site is a breeding ground and home for a variety of wildlife and therefore removal of land would result in loss of habitat. Area can become extremely boggy, any development would effect trees, hedgerows and grassland which are vital in land stabilisation and water saturation. Waste already a major issue in a number of surrounding areas to the site, this will only heighten with an increase in size of the community.	Further consideration required Take into account in considering preferred sites for allocation
1116	John Pollard	Object	103		Object due to increased traffic, lack of facilities to support population increase, visual and ecological impact, disruption of building work, reducing size of Cut Wood Park, and impact on open ended cul-de-sacs (Derwent, Ulverston, Windermere, Grasmere).	Further consideration required Take into account in considering preferred sites for allocation
657	Jack Hargreaves	Object	103		3A factors - Site includes Lancashire Woodland Ecological Network and Lancashire Wildlife Trust concerned about loss of these habitats (e.g. lapwing). Also this site is within the Green Belt and brownfield sites should be developed first. 3B - Access from Cut Lane (new road) for new development would result in losing part of Cut Wood Park. Safety of people using the park facilities would be compromised. Access from Harwood Road cause traffic problems and pedestrian hazards near schools. 3C - Not sufficient service capacity in Rishton to cope with the demand of new housing development (Particularly medical centre overstretched)..	Further consideration required Take into account in considering preferred sites for allocation
1127	Lynne & Dennis Webster	Object	103		Objection based on land ownership constraints, loss of parkland for access, felling of trees/hedgerows, noise and air pollution from traffic, increased risk for children using play area, increased risk of flooding, and use of a Green Belt site when previously developed land is readily available.	Further consideration required Take into account in considering preferred sites for allocation
576	Lynda Calverley	Object	103		Objection relating to Green Belt land, valued visual amenity, habitat for wildlife / hedgerow loss, trees lost for access, concern for increase in traffic and pedestrian safety, and that development would disrupt nearby residents.	Further consideration required Take into account in considering preferred sites for allocation
577	Colin Kay	Object	103		Objects relating to grounds of safety, health, access/egress onto surrounding busy and dangerous roads, air quality and noise.	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
1136	Warren Melia	Not Stated	103		Concerns raised over additional land required to widen Cut Lane, lack of adoption of the current Cut Lane. Single point of access to such a large development would cause problems on Blackburn Road. Vehicles travel at speed from Junction 6 into Rishton and the Cut Lane entrance is almost invisible. Traffic management would be essential.	Further consideration required Take into account in considering preferred sites for allocation
540	Elaine and David Stanton	General Comment	103		Protection of Green Belt reassurance is required for Rishton as has been provided in Great Harwood	Further consideration required To be confirmed at Publication stage of the plan once Growth Option and Spatial Option are confirmed and supply of suitable, available, achievable sites is also confirmed
960	Ian Smith Historic England	Object	104		<p>Site 104 Land north of Parker St Tottleworth Bridge, to the west of this site is a Grade II Listed Building, and the Tottleworth Conservation Area 250 metres to the north-east. The loss of this currently undeveloped area and its subsequent development could harm elements which contribute to their significance.</p> <p>Detailed comments relating to requirements of NPPF and Planning Act Act regarding conserving heritage assets, considering impact of development on their significance and setting and desirability of preserving listed buildings. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of the heritage assets and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	Further consideration required Take into account in considering preferred sites for allocation
1137	Warren Melia	Not Stated	104		Concerns raised over impact of the development (alongside existing developments) on Tottleworth Bridge, and the cumulative highways impact of planned/proposed developments onto Hermitage Street.	Further consideration required Take into account in considering preferred sites for allocation
565	Jeff Scales	General Comment	104		Concerned about the increased traffic, although if site was to be developed investment for children's play space or landscaped greenspace is key.	Noted See Policy CS6 and adopted Policy DM11

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
660	Jack Hargreaves	Support	105		Site has direct access to the M65.	Noted
638	Derek Evans	Object	105		Objects as area will be susceptible to high levels of air and noise pollution making it unsuitable for development. Planning permission for development should be refused where it does not mitigate air pollution.	Further consideration required Take into account in considering preferred sites for allocation
1115	John Pollard	General Comment	105		Preference for any brownfield land to be used for future developments, however Site 105 would be a potential alternative to meet the number of homes required, keeping majority of traffic outside of Rishton.	Noted
1138	Warren Melia	General Comment	105		The gap between the two sets of houses on Blackburn Road is there due to the hillside/fields tending to flood down the waterway into the lake/reservoir.	Further consideration required Take into account in considering preferred sites for allocation
1142	Kerry Pollard	General Comment	105		Any brownfield land preferable for future developments in Rishton, but failing this site 105 would meet the number of houses required with easy access to M65 (leaving majority of traffic outside Rishton).	Further consideration required Take into account in considering preferred sites for allocation
836	Warren Hilton Highways England	General Comment	105		Concern of multiple sites proposed around and on the approaches to J6 - likely access arrangements onto the roundabout (sites 106, 169, 88, 105, 228, 229 and 230) and the possibility that multiple sites beyond these could share the same connection onto the roundabout, which already has five arms (two carrying M65 exit slips).	Further consideration required Further consultation to take place with Highways England and further evidence on Transport matters to be undertaken prior to considering preferred sites for allocation
582	Ibrar Ali	Object	105		Objection relating to Green Belt land used for a variety of wildlife uses and that development would take away visual amenity of residents.	Further consideration required Take into account in considering preferred sites for allocation
1114	Christopher Pollard	General Comment	105		Preference for any brownfield land to be used for future developments, however Site 105 would be a potential alternative to meet the number of homes required, keeping majority of traffic outside of Rishton.	Noted
566	Jeff Scales	Object	105		Objects to Green Belt development as substantial expansion of Rishton boundary	Further consideration required Take into account in considering preferred sites for allocation

**Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)**

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
701	Warren Hilton Highways England	General Comment	106		Concern of multiple sites proposed around and on the approaches to J6 - likely access arrangements onto the roundabout (sites 106, 169, 88, 105, 228, 229 and 230) and the possibility that multiple sites beyond these could share the same connection onto the roundabout, which already has five arms (two carrying M65 exit slips).	Further consideration required  Further consultation to take place with Highways England and further evidence on Transport matters to be undertaken prior to considering preferred sites for allocation
579	Wood and National Grid	General Comment	106		Proposed site is crossed by a National Grid high voltage electricity transmission overhead line - plan provided and advice on statutory clearances and development near overhead lines.	Further consideration required  Take into account in considering preferred sites for allocation
969	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	106		site 106 Whitebirk Moss Assessment states "no suitable access", site should be discounted. Revised capacity should be 0.	Further consideration required  Take into account in considering preferred sites for allocation
698	Warren Hilton Highways England	Object	106		Site No.106 for approx 260 dwellings on land accessed directly from the roundabout is an unsuitable location for housing, particularly in terms of noise and air quality.	Further consideration required  Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
946	Ian Smith Historic England	Object	106		<p>Site 106 Whitebirk Moss</p> <p>Some 460 metres to the east of this site are Parker's Farmhouse (a Grade II* Listed Building) and Rose Cottage (a Grade II Listed Building). The loss of this currently undeveloped area and its subsequent development could harm elements which contribute to their significance. Detailed comments relating to requirements of NPPF and Planning Act regarding conserving heritage assets, considering impacts of development on conservation area and listed buildings and desirability of preserving listed buildings. Special reference is made to the grade II* listed building which is of highest significance. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of the assets and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full detail</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1167	Adam Brennan United Utilities	General Comment	107		<p>Some of the land is required for a future capital scheme as part of the next AMP 2020-2025. Details not clear at this stage and continued dialogue with the Council is needed.</p>	<p>Further consideration required</p> <p>Continue dialogue to ascertain potential of site.</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
923	Ian Smith Historic England	Object	107		<p>Site 107 Land between M65, Dunkenhalgh Way and (Leeds/Liverpool Canal)</p> <p>This site adjoins and, at its south-eastern corner, lies within the Church Canalside Conservation Area. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to the significance of this area. The development of this site could also harm the setting of the Grade II Listed Church Kirk Bridge and the Grade II* Listed Church of St James.</p> <p>Detailed comments relating to requirements of NPPF and Planning Act regarding conserving heritage assets, considering impacts of development on conservation area and listed buildings. Special reference is made to the grade II* listed building which is of highest significance. Stage 3 detailed appraisal needs to assess these matters. Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full detail</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
615	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	108		<p>Site 108 includes Local Wildlife Site Number 11, Evidenced Local Wildlife Site Number 50 and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
572	S Walsh	Object	108		<p>Objects as perceives unacceptable adverse impact on the character and appearance of this area of countryside.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
919	Ian Smith Historic England	Object	108		<p>Site 108 Devine Fisheries</p> <p>This proposed access road to this site from the A680 would run through a heavily-wooded area which lies within the Christ Church Conservation Area. The creation of an access road sufficient to serve 122 dwellings could harm elements which contribute to the character of this part of the Conservation Area.</p> <p>Detailed comments relating to requirements of NPPF and 1990 Act regarding conserving heritage assets, considering impact of development on their significance and setting and duty to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site to conservation area and impact of proposed access road; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196). See full rep for details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
573	S Walsh	Object	110		<p>Objects as perceives unacceptable adverse impact on the character and appearance of this area of countryside.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
616	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	111		<p>Site 111 includes Local Wildlife Site Number 7, Evidenced Local Wildlife Site Number 5, Walmden Clough Biological Heritage Site and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
574	S Walsh	Object	111		<p>Objects as perceives unacceptable adverse impact on the character and appearance of this area of countryside.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
943	Ian Smith Historic England	Object	116		<p>Site 116 Barnmeadow Lane &amp; Back Queen Street</p> <p>This site adjoins the boundary of the Great Harwood Conservation Area. Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting.</p> <p>Suggested change that if allocated, the plan should ensure that elements which contribute to significance of the Conservation area are not harmed by development.</p> <p>See full rep for details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1005	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	117		<p>Site 117 Lower Barnes St</p> <p>site already included in five year housing land supply. Revised capacity should be 0.</p>	<p>Noted</p> <p>Site is included in the five year supply but does not yet have planning permission. Progress to be monitored and will be removed from further consideration if planning status changes.</p>
1203	Sport England	Object	123		<p>Allocation of this site would need to demonstrate how it complies with the NPPF (para 96-97) and Sport England's Playing Fields Policy (i.e. loss or prejudice of use of land meeting one or more of five specific exceptions). The site includes a school and playing field (or land used as such in the last 5 years) - there is currently no reference to this in the site assessment (just agricultural and school building). Any allocation would need to be assessed in line with paragraphs 96-97 of the NPPF. Assessment should make reference to school playing field.</p>	<p>Agree - make change</p> <p>Add reference to school playing field on assessment and update site boundary to remove school building and associated playing field.</p>
970	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	123		<p>Site 123</p> <p>Land South of Stanhill Road</p> <p>Site has outline planning permission and is included within 5 year supply. Revised capacity should be 0.</p>	<p>Further consideration required</p> <p>Part of site has outline planning permission for residential development. Site boundary to be amended to exclude land with permission.</p>
1169	Adam Brennan United Utilities	Not Stated	123		<p>UU has records of wastewater network issues in the area and have preference for development to be located in alternative location as a range of sites are being considered at this stage.</p>	<p>Further consideration required</p> <p>Matters to be considered in developing preferred sites in consultation with UU and LLFA</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
1170	Adam Brennan United Utilities	Not Stated	124		UU has records of wastewater network issues in the area and have preference for development to be located in alternative location as a range of sites are being considered at this stage.	Further consideration required  Matters to be considered in developing preferred sites in consultation with UU and LLFA
539	Geoff Grundy Local trustees Trinity URC and Methodist Church	General Comment	129		Requesting removal of church from site allocations DPD.	Agree - make change
944	Ian Smith Historic England	Object	129		Site 129 Land between Holgate Street and King Street This site adjoins the boundary of the Great Harwood Conservation Area. Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, the plan should ensure that elements which contribute to significance of the Conservation area are not harmed by development.  See full rep for details	Further consideration required  Take into account in considering preferred sites for allocation
1006	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	133		site 133 Site off Oak St criterion 3E.2 records owner unwillingness. Revised capacity should be 0.	Further consideration required  Take into account in considering preferred sites for allocation
934	Ian Smith Historic England	Object	133		Site 133 Site off Oak Street The Canal warehouses with attached office and house, on west side of Leeds-Liverpool Canal is a Grade II Listed Building. Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, plan should ensure that the Listed building should be retained and elements which contribute to significance of heritage assets are not harmed.  See full rep for details	Further consideration required  Take into account in considering preferred sites for allocation

**Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)**

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
1007	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	134		site 134 land rear of Collingwod and J7 business park Site remote from adopted highway. Revised capacity should be 0.	Further consideration required Take into account in considering preferred sites for allocation
654	Paul Worswick	Object	134		This site forms open space requirements for housing at Brantwood and Collingwood and should be therefore considered as a Local Green Space to afford it protection against future development. Site also contains land contaminants and if development went ahead costly remediation would be needed. Vehicular access significant problem.	Further consideration required Take into account in considering preferred sites for allocation
652	Bernard Mcanenny	Object	134		Objections relating to proposed site having poor access, contaminated waste, major sewer pipe through the site, increased strain on services in Clayton le Moors that are already overstretched, local school is at maximum capacity and site is habitat for many species. Would also require demolition of private residential properties.	Further consideration required Take into account in considering preferred sites for allocation
1152	N O'Rourke	Object	134		objection to site which is considered wholly unsuitable for development on the following grounds: -site is inaccessible, requires demolition of properties to access it which is bizarre; - land has buried contaminated waste; - current raod network is wholly inadequate and overstretched; - local infrastructre cannot take any more cars and houses; - Hare and Hounds junction is currently at bursting point.	Further consideration required Take into account in considering preferred sites for allocation
1139	Warren Melia	General Comment	135		Too remote a site for housing, this should be used for business use due to proximity to Junction 7 and the bus stop outside. Potential asbestos in the existing building.	Further consideration required Take into account in considering preferred sites for allocation
661	Jack Hargreaves	Support	135		Supports development of this site.	Noted

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
617	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	135		Site 135 includes Shaw Brook and Mill Wood Biological Heritage Site, deciduous woodland and lowland dry acid grassland, both of which are listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation
567	Jeff Scales	Support	135		Supports development of site due to current problems it generates. Despite numerous challenges, site has potential to link to a more substantial development up the hill towards the reservoir.	Noted
961	Ian Smith Historic England	Object	135		Site 135 Holt Mill, Hermitage St Holt Mill Cottages and Holt Mill House to the west of this site are Grade II Listed Buildings.  Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, plan should ensure that elements which contribute to significance of heritage assets are not harmed.  See full rep for details	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
914	Ian Smith Historic England	Object	136		<p>Site 136 Former Huncoat Colliery, Altham Lane High Brake Hall on the south-eastern edge of this site is a Grade II Listed Building. The loss of this currently undeveloped area and its subsequent development could harm elements which contribute to its significance. Detailed comments relating to requirements of NPPF and Planning Act Act regarding conserving heritage assets, considering impact of development on their significance and setting and desirability of preserving listed buildings. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See actual rep for full detail</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
618	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	136		<p>Site 136 includes Local Wildlife Site Number 23, Evidenced Local Wildlife Site Number 31 and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1200	Sport England	Object	138		<p>Allocation of this site would need to demonstrate how it complies with the NPPF (para 96-97) and Sport England's Playing Fields Policy (i.e. loss or prejudice of use of land meeting one or more of five specific exceptions). The site lies adjacent to Accrington Cricket Club site. The cricket club site also provides football, a pavilion and changing facilities. Any development on site 138 could prejudice the sports that take place at the cricket club as it appears to provide ancillary use to the sporting activities (car parking). Potential capacity of site reduced. LA is also advised to consider risk of ball strike from the cricket pitch as well.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
739	Gerard Bolton	Support	139		<p>Sites within the urban boundary should be seriously considered before any sites in the Green Belt - this and other sites in the urban area highlighted are sufficient to achieve the Core Strategy Growth</p>	<p>Noted</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
595	Lisa Barnes	Support	139		Supports development for site as brownfield/derelict and would enhance area.	Noted
740	Gerard Bolton	Support	140		Sites within the urban boundary should be seriously considered before any sites in the Green Belt - this and other sites in the urban area highlighted are sufficient to achieve the Core Strategy Growth	Noted
1008	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	142		site 142 Land off Riverside View Ransomed/remote from adopted highway. Revised capacity should be 0.	Further consideration required Take into account in considering preferred sites for allocation
722	Stuart Booth JWPC Ltd	Support	142		Proposed allocation at Riverside View, off Lower Barnes Street, Clayton-le-Moors. Site is owned by Beck Homes Ltd. Representee has submitted Site Assessment completed in line with the Council's methodology for this site. Site is within the urban area adjacent to existing residential properties.	Further consideration required Take into account in considering preferred sites for allocation
935	Ian Smith Historic England	Object	143		Site 143 Site at St James St, off Barnes St This site adjoins the boundary of the Mercer Park Conservation Area. Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, the plan should ensure that elements which contribute to significance of the Conservation area are not harmed by development.  See full rep for details	Further consideration required Take into account in considering preferred sites for allocation
1009	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	143		site 143 Site at St James St, off Barnes St Part is unwilling to develop. Include area with pp only. Revised capacity should be 6.	Further consideration required Take into account in considering preferred sites for allocation

**Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)**

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
1010	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	144		site 144 Site at Hazel Ave Unwillingness to develop in part, remainder constrained by access. Revised capacity should be 0.	Further consideration required Take into account in considering preferred sites for allocation
1091	Kevin Parkinson	Support	145		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
1080	E Neville	Support	145		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
1071	Nigel Aubrey	Support	145		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
662	Jack Hargreaves	Support	145		Supports development of this site.	Noted
1060	Mary Aubrey	Support	145		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
568	Jeff Scales	Support	145		Favours any development around reservoir site, with the exception of Nurture which should remain in the area.	Noted
1125	Ken Griggs	Object	145		Objection to development on this site based on concerns of overlooking, loss of light, lack of local amenities, and parking/congestion issues.	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
619	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	145		Site 145 includes Shaw Brook and Mill Wood Biological Heritage Site and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation
1140	Warren Melia	Support	145		This site is away from the problematic traffic bottlenecks and is for a relatively low number of dwellings so there is no problem with this site.	Noted
569	Jeff Scales	Object	146		Concerned about the loss of an employment site.	Further consideration required Take into account in considering preferred sites for allocation
1081	E Neville	Support	146		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
1092	Kevin Parkinson	Support	146		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
1069	Nigel Aubrey	Support	146		Broad support for development of this brownfield site within urban boundary. Brownfield sites should be prioritised over Green Belt, countryside should be protected.	Noted
971	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	147		site 147 Land south of Warcock Green Farm Site is landlocked but could be accessed through site 123 which has same owner.	Further consideration required Take into account in considering preferred sites for allocation
1174	Adam Brennan United Utilities	Not Stated	147		UU has records of wastewater network issues in the area and have preference for development to be located in alternative location as a range of sites are being considered at this stage.	Further consideration required Matters to be considered in developing preferred sites in consultation with UU and LLFA

**Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)**

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
707	Simon Thomas	Object	148		Strongly objects on the basis of: traffic congestion currently being a problem and that proposed developments will only worsen this issue; noise pollution; environmental ruination; Hyndburn has many vacant houses that could be developed; and forecast population decline. A complete re-think is needed regarding housing need.	Further consideration required Take into account in considering preferred sites for allocation
985	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	148		site 148 Rhoden Road Site overlaps site 3 and is undeliverable without site 164, needs comprehensive masterplan. Severely limited by mature trees and flood risk. Revised capacity should be 0.	Further consideration required Take into account in considering preferred sites for allocation
920	Ian Smith Historic England	Object	150		Site 150 Chapel Stree garage site, Abbey Street. This site adjoins the boundary of the Christ Church Conservation Area. The redevelopment of this site could also impact upon the setting of the Magistrates Court and Police Station and the adjacent Fire Station all of which are Grade II Listed Buildings.  Detailed comments relating to requirements of NPPF and Listed Building Act regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, plan should ensure that elements which contribute to significance of heritage assets are not harmed.  See full rep for details	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
921	Ian Smith Historic England	Object	151		<p>Site 151 Land off Yorkshire St Woodnook</p> <p>This site lies opposite the Christ Church Conservation Area. The loss of this currently-undeveloped site and its subsequent development could harm elements which contribute to the significance of this area. Detailed comments relating to requirements of NPPF and Listed Building Act regarding conserving heritage assets and considering impact of development on conservation area. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full detail</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
620	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	152		<p>Site 152 includes the Blackburn to Colne Railway and West Accrington Recreation Corridor, Lonsdale Street to Crossland Street and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
924	Ian Smith Historic England	Object	156		<p>Site 156 Aero Mill, Kershaw Street</p> <p>This site lies within the Church Canalside Conservation Area. The former Church Kirk Mill has been identified by the Council as a Locally Listed Building. In addition, a survey of the Lancashire Textile Mills by Historic England in 2017 concluded that the buildings were of 'High Significance' (i.e. that they were important at regional level). Detailed comments relating to requirements of NPPF and Listed Building Act regarding conserving heritage assets, considering impacts of development on conservation area and listed buildings. Suggested change that if allocated, the mill buildings should be retained and reused and that proposals should ensure that those elements which contribute to the significance of the Conservation Area are not harmed.</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
925	Ian Smith Historic England	Object	157		<p>Site 157 Land opposite 27-41 Church St</p> <p>This site lies within the Church Canalside Conservation Area. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to the significance of this area. Detailed comments relating to requirements of NPPF and Planning Act regarding conserving heritage assets, considering impacts of development on conservation area and duty to pay "special attention" to "the desirability of preserving or enhancing the character or appearance" of its Conservation Areas. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
926	Ian Smith Historic England	Object	158		<p>Site 158 Land at Commercial St</p> <p>This site lies adjacent to the Church Canalside Conservation Area. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to the significance of this area. Detailed comments relating to requirements of NPPF regarding conserving heritage assets, considering impacts of development on conservation area and its setting. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
972	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	159		<p>site 159 Land at Abbott Clough Avenue</p> <p>site undevelopable due to mature trees on eastern side and flood zone on western side. Revised capacity should be 0.</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
973	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	160		site 160 St Ives Road/Cornwall Ave Site should be discounted due to loss of mature trees, flood zone and ecological impact. Revised capacity should be 0.	Further consideration required Take into account in considering preferred sites for allocation
986	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	161		site 161 Land east of Thwaites Road site already in 5 year housing land supply. Revised capacity should be 0.	Agree - make change Site has full planning permission and is under construction so will be removed from further consideration for allocation.
987	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	162		site 162 64 New Lane questions whether site falls below threshold for allocation. Revised capacity should be 0.	Disagree - no change Site size and capacity are above threshold of 0.15ha/5 dwellings for assessment as part of site allocation process
958	Ian Smith Historic England	Object	163		Site 163 Immanuel Vicarage, New Lane The Church of Immanuel, to the north of this site, is a Grade II Listed Building. The loss of this largely-undeveloped area and its subsequent development could harm elements which contribute to its significance  Detailed comments relating to requirements of NPPF and Planning Act Act regarding conserving heritage assets, considering impact of development on their significance and setting and desirability of preserving listed buildings. Stage 3 detailed appraisal needs to assess these matters.  Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of the heritage assets and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).  See rep for full details	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
988	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	163		site 163 Immanuel Vicarage Impact on mature trees. Revised capacity should be 0.	Further consideration required Take into account in considering preferred sites for allocation
708	Simon Thomas	Object	164		Strongly objects on the basis of: traffic congestion currently being a problem and that proposed developments will only worsen this issue; noise pollution; environmental ruination; Hyndburn has many vacant houses that could be developed; and forecast population decline. A complete re-think is needed regarding housing need.	Further consideration required Take into account in considering preferred sites for allocation
989	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	164		site 164 Land off Rhoden Road Site already has outline planning permission for 34 dwellings. Revised capacity should be 0.	Agree - make change Site has planning permission so will be removed from further consideration for allocation.
990	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	165		site 165 Land off Merlin Drive POS for exiting housing. Site is limited because of flood risk and tree coverage. Revised capacity should be 0.	Further consideration required Take into account in considering preferred sites for allocation
991	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	166		site 166 north and east of John Street questions whether site falls below threshold for allocation. Revised capacity should be 0.	Disagree - no change Site size and capacity are above threshold of 0.15ha/5 dwellings for assessment as part of site allocation process
947	Ian Smith Historic England	Object	169		Site 169 land at Whitebirk between A6119 and L&L canal The Red Lion Inn to the south of this site is a Grade II Listed Building. Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, plan should ensure that elements which contribute to significance of heritage assets are not harmed.  See full rep for details	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
834	Warren Hilton Highways England	General Comment	169		Concern of multiple sites proposed around and on the approaches to J6 - likely access arrangements onto the roundabout (sites 106, 169, 88, 105, 228, 229 and 230) and the possibility that multiple sites beyond these could share the same connection onto the roundabout, which already has five arms (two carrying M65 exit slips).	Further consideration required  Further consultation to take place with Highways England and further evidence on Transport matters to be undertaken prior to considering preferred sites for allocation
936	Ian Smith Historic England	Object	173		Site 173 Land between Syke Side Drive and Burnley Rd This site lies opposite the St James Conservation Area. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to its significance. Detailed comments relating to requirements of NPPF regarding conserving heritage assets, considering impacts of development on conservation area and its setting. Stage 3 detailed appraisal needs to assess these matters. Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).  See rep for full details	Further consideration required  Take into account in considering preferred sites for allocation
937	Ian Smith Historic England	Object	178		Site 178 Land off Sparth Road (adj Royal Oak PH) This site adjoins the boundary of the Mercer Park Conservation Area. Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, the plan should ensure that elements which contribute to significance of the Conservation area are not harmed by development.  See full rep for details	Further consideration required  Take into account in considering preferred sites for allocation
1141	Warren Melia	Not Stated	192		Concerns raised over practicality of access, and loss of key rights of way.	Further consideration required  Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
570	Jeff Scales	Object	192		Concerned about the access road and additional traffic pressure in the area.	Further consideration required Take into account in considering preferred sites for allocation
927	Ian Smith Historic England	Object	194		<p>Site 194 land on Maden Street (east of Edward Street) This site lies adjacent to the Church Canalside Conservation Area. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to the significance of this area. Detailed comments relating to requirements of NPPF regarding conserving heritage assets, considering impacts of development on conservation area and its setting. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	Further consideration required Take into account in considering preferred sites for allocation
928	Ian Smith Historic England	Object	195		<p>Site 195 land on Maden Street (west of Edward St) This site lies within the Church Canalside Conservation Area. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to the significance of this area.</p> <p>Detailed comments relating to requirements of NPPF and Planning Act regarding conserving heritage assets, considering impacts of development on conservation area and duty to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Detailed suggested relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
992	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	196		Site 196 land between Hartley St and Hodgson St questions whether site falls below threshold for allocation. It is POS for existing housing and open space review is required - town/village green implications. Revised capacity should be 0.	Further consideration required Site size and capacity are above threshold of 0.15ha/5 dwellings for assessment as part of site allocation process. Open space issues need further consideration.
993	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	197		Site 197 Brookside View Play area Questions whether site falls below threshold for allocation. It is POS for existing housing and open space review is required - town/village green implications. Revised capacity should be 0.	Further consideration required Site size and capacity are above threshold of 0.15ha/5 dwellings for assessment as part of site allocation process. Open space issues need further consideration.
938	Ian Smith Historic England	Object	201		Site 201 Site off Oak St The stable block at the southern end of this site adjacent to the Leeds-Liverpool Canal is a Grade II Listed Building. Detailed comments relating to requirements of NPPF regarding conserving heritage assets and considering impact of development on their significance and setting. Suggested change that if allocated, plan should ensure that the Listed building should be retained and elements which contribute to significance of heritage assets are not harmed.  See full rep for details	Further consideration required Take into account in considering preferred sites for allocation
1011	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	201		site 201 Clayton Triangle Title (ownership) appears fragmented. Revised capacity should be 0.	Further consideration required Take into account in considering preferred sites for allocation
1147	David Ashworth	Object	202		Objection based on the following reasons: the land is Green Belt; access - already disruption on Clayton Hall Road, and traffic from the Hyndburn Bridge to the Hare and Hounds is already far too heavy. The new bus lane does not improve public transport links; impact on wildlife through disposal of habitat and noise and light pollution	Further consideration required Take into account in considering preferred sites for allocation

**Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)**

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
621	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	202		Site 202 includes Ancient and Semi-Natural Woodland, Brownsills Wood Biological Heritage Site and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation
1110	Amy James Indigo Planning	Not Stated	202		Detailed supporting letter which generally welcomes the site assessment process. Representation adds significant further detail for site at Cottams Farm: - assessment of the site context and green belt, proposes reducing developable site area of site to minimise impacts and a green belt assessment on the smaller area of land is provided; - further information provided on criteria from the site assessment process that was incomplete at Reg18(2) stage (left grey) - includes visual impact and landscape impact, highways capacity and ownership information; - further information provided on criteria scored red in the initial assessment (ecology, priority species, accessibility by train, and merging of settlements)	Further consideration required Take into account in considering preferred sites for allocation
814	Brendan Duffy	Object	202	7	Table 2: Number of sites assessed in the local plan. Objects to the number of sites assessed outside the urban boundary (18) and specifically site 202	Further consideration required Take into account in considering preferred sites for allocation
733	Ian & Christine Cairns	Object	202		Objections relating to Green Belt land, bluebell wood, bat habitat, site of open cast mining, access from Whalley road already a problem when sports events are on at Wilsons, schools already oversubscribed, sewage/liability to flooding, destruction of natural habitats, and pollution from increased traffic.	Further consideration required Take into account in considering preferred sites for allocation

**Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)**

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
815	Brendan Duffy	Object	202		<p>Objection to site 202 (land at Cottams Farm) on grounds which can be summarised as:</p> <ul style="list-style-type: none"> <li>- site is Green Belt</li> <li>- site is a nature reserve part of which is protected bluebell wood and bat activity</li> <li>- previous planning permission was denied in the area due to open cast mine and mine shafts</li> <li>- traffic congestion is already the worst in Hyndburn</li> <li>- traffic parking and access will be a major problem due congestion</li> <li>- air quality is a problem issues due to proximity to Whinny Hill Recycling Centre and traffic volume on Whalley Road</li> </ul>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1148	Jennie Bradley	Object	202		<p>Objection to development of site 202 Cottams Farm on the following grounds: Green Belt; traffic problems especially with access being from Whalley Road; destruction of natural wildlife habitats; and schools are already over-subscribed.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1149	Angela Emanuel	Object	202		<p>Objection to site 202 Cottams Farm on the following grounds: will create traffic issues on a quiet residential road and accentuate parking problems (particularly when events are held on Wilson Playing fields); insufficient local infrastructure to support development (schools, hospitals, doctors etc); and it will make traffic worse on Whalley Road, which is currently very heavy.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1150	S Nicholson	Object	202		<p>Objection to site 202 Cottams Farm on grounds of: traffic in Clayton is already at a stand still every week day; doctors are over subscribed; and schools are full.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
752	John Cookson	Object	202		<p>Objects to Green Belt land when opportunity to develop brownfield sites and revitalise run-down urban areas is there to achieve target number of new homes (360 in Clayton-le-Moors). Woodland and diverse wildlife present on the site. Poor access to proposed site and traffic problems already exist which would only be exacerbated.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
822	Cheryl Duffy	Object	202		<p>Objects to all greenfiled sites being accessed specifically site 202</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
1151	Graham Walmsley	Object	202		objection to site 202 Cottams Farm on following grounds: access along Woodlands Drive would be unacceptable, it is a quiet estate and development would create problems with parking and traffic; there is no infrastructure in place to support more families i.e. schools, doctors, A&E and hospital facilities; Whalley Road is already a nightmare with traffic and additional traffic would create a gridlock.	Further consideration required Take into account in considering preferred sites for allocation
727	Alison Whybrow-Parker	Object	202		Objections relating to Green Belt land separating existing settlements, habitat for wildlife (including bats), services already struggling to cope (including schools already full), volume of traffic is a significant problem and site is adjacent to waterways which regularly flood. Access to the site is extremely restricted for construction and future residents.	Further consideration required Take into account in considering preferred sites for allocation
812	Elizabeth Knox	Object	202		Objection to site 202 (land at Cottams Farm) on grounds which can be summarised as: - site is Green Belt - site is a nature reserve with bat activity and a parrot - previous planning permission was denied in the area due to open cast mine and mine shafts - traffic congestion is already the worst in Hyndburn - air quality issues due to proximity to Whinny Hill Recycling Centre, - traffic and access will be a problem due to volume of traffic on Whalley Road, stationary and slow moving traffic - close to the flood line, which could rise with global warming	Further consideration required Take into account in considering preferred sites for allocation
1001	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	202		site 202 Land at Cottams Farm site may constitute strategic gap. Revised capacity should be 0.	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
772	Maureen Kenyon	Object	202		<p>Detailed comments re site 202 Cottams Farm Clayton le Moors amounting to objection to the development of the site on following grounds:</p> <ul style="list-style-type: none"> <li>- the land is greenbelt, little remains in the vicinity, it must help with pollution;</li> <li>- land is bound by a well used footpath, the Ladybird trail.</li> <li>- it would be inappropriate to build two storey buildings adjacent to the Woodlands estate of bungalows;</li> <li>- access would be a problem for residents and traffic using Whalley;</li> <li>- it would be a prime site in attracting high value homes which would attract commuters and add to congestion;</li> <li>- few jobs available to support high price properties;</li> <li>- local people need affordable local homes and jobs</li> </ul>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
819	Cheryl Duffy	Object	202	42	<p>Objection to site 202 (land at Cottams Farm) on grounds which can be summarised as:</p> <ul style="list-style-type: none"> <li>- site is Green Belt</li> <li>- site is a nature reserve with bat activity. Nature is abundant with bats, bluebells, robins, bluetits, coaltits, blackbirds, jays, butterflies, chaffinches, wood pigeons, woodpeckers, foxes, deer, weasels which can be seen daily.</li> <li>- previous planning permission was denied in the area due to open cast mine and mine shafts</li> <li>- traffic congestion is already the worst in Hyndburn, parking and access would be a major issue</li> <li>- air quality - Companies House Global Renewables 2016 Report</li> </ul>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
816	Brendan Duffy	Object	202		<p>concerns at level of secrecy surrounding development plan, few knew of it, few buy the Accrington Observer or use Facebook. Questions why a proposal to build 193 houses was not communicated to residents. Concerns also that the plans are not showing on recent searches when buying properties.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
596	M.G. Courtney	Object	202	77	<p>Assessment on accessibility to employment from site 202 is incorrect as the Abattoir Site on Wood St is closed; visual impact of development would be unacceptable; impacts on river and surrounding land would be unacceptable; site is a wildlife corridor (deer, bats, herons); lack of demand for new housing in the area; no major employers nearby; oak trees would need TPOs; traffic on A680 already ridiculous at peak times.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

**Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)**

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
820	Cheryl Duffy	Object	202		concerns at level of secrecy. Questions why the potential development is not showing up on solicitors searches. Local residents are of an age that don't use social media - Facebook. 193 will triple size of estate and why was it not communicated directly?	Further consideration required Take into account in considering preferred sites for allocation
581	Irene Pye	Object	202		Objection relating to Green Belt, increased traffic flow, dangerous access to estate, residents unaware of plans, added air pollution causing ill-health, and the current need for a by-pass in Clayton.	Further consideration required Take into account in considering preferred sites for allocation
713	John Hindle	Object	202		Objections relating to Whalley Road can't cope with present volume of traffic, site is Green Belt and potential flooding issues around the Hyndburn Bridge pub.	Further consideration required Take into account in considering preferred sites for allocation
818	Cheryl Duffy	Object	202	7	Table 2: Number of sites assessed in the local plan. Objects to the number of sites assessed outside the urban boundary (18) and specifically site 202	Further consideration required Take into account in considering preferred sites for allocation
811	Elizabeth Knox	Object	202	7	Table 2: Number of sites assessed in the local plan. Objects to the number of sites assessed outside the urban boundary (18) and specifically site 202	Further consideration required Take into account in considering preferred sites for allocation
718	Wendy Hindle	Object	202		Objections relating to Green Belt land (before brownfield land), Whalley Road cannot cope with the potential for more traffic, severe flood risk to the area, local schools in Clayton already full and visual impact would be detrimental. Views from our side extension would be lost. Access to the site from the existing access road would be a safety hazard, and from Woodland Drive would be unacceptable to existing residents.	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
929	Ian Smith Historic England	Object	203		<p>Site 203 Land adjacent to swing bridge, Dunkenhalth Way This site adjoins the boundary of the Church Canalside Conservation Area. The loss of this currently-undeveloped site and its subsequent development could harm elements which contribute to the significance of this area.</p> <p>Detailed comments relating to requirements of NPPF regarding conserving heritage assets, considering impacts of development on conservation area and its setting. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
994	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	204		<p>site 204 land south of Nook Lane and west of Margaret St/New Lane site remote from adopted highway. Revised capacity should be 0.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
974	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	205		<p>site 205 Land opposite Old Mother Redcap need to check if overhead cables have "lift and shift" clause. Significantly impact on developable area.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
948	Ian Smith Historic England	Object	205		<p>Site 205 Land opposite Old Mother Redcap, Knuzden Peel Fold Farmhouse (immediately adjacent to the western edge of this site) and Knuzden Hall and Knuzden Hall Farmhouse (300 metres to the east) are Grade II Listed Buildings. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to their significance.</p> <p>Detailed comments relating to requirements of NPPF and Planning Act Act regarding conserving heritage assets, considering impact of development on their significance and setting and desirability of preserving listed buildings. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of heritage assets and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p> <p>See rep for full detail</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
699	Warren Hilton Highways England	Object	205		<p>Site No.205 is on a narrow, marginal strip of land adjoining the motorway which may preclude future widening of the M65 to three lanes. Proposed allocation does not make a sufficient contribution to the Borough's housing need to warrant their inclusion in the plan.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
995	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	206		<p>site 206 Front of Sunnybank Drive, rear of New Lane site remote from adopted highway. Revised capacity should be 0.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
975	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	207		<p>Land off Moss Lane/Stanhill Lane need to check extent of adopted highway against ownership, very wide verge</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
700	Warren Hilton Highways England	Object	207		Site No.205 is on a narrow, marginal strip of land adjoining the motorway which may preclude future widening of the M65 to three lanes. Proposed allocation does not make a sufficient contribution to the Borough's housing need to warrant their inclusion in the plan.	Further consideration required Take into account in considering preferred sites for allocation
622	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	208		Site 208 includes part of Woodnook Vale Local Nature Reserve, Priestly Clough and East Lancashire Railway Biological Heritage Site and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation
849	Alison Whybrow-Parker	Object	209		Object on various grounds including impacts on Green Belt, local amenities/services, traffic and wildlife (including bat population)	Further consideration required Take into account in considering preferred sites for allocation
1174	Adam Brennan United Utilities	Not Stated	210		site has significant water infrastructure passing through it and which may significantly restrict developable area and prevent access to site 212. LPA should request easement details from UU to ascertain developable area.	Further consideration required Obtain details of easement from UU to assess developable area
939	Ian Smith Historic England	Object	211		Site 211 Land at Moorside Farm 2, Altham (north of canal) Moor Side House to the south of this site is a Grade II Listed Building. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to the setting of this building. Detailed comments relating to requirements of NPPF and the 1990 Act regarding conserving heritage assets, considering impacts of development on the asset and desirability of preserving listed buildings etc. Stage 3 detailed appraisal needs to assess these matters. Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of the asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).  See rep for full details	Further consideration required Take into account in considering preferred sites for allocation

**Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)**

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
1175	Adam Brennan United Utilities	Not Stated	211		site has significant water infrastructure passing through it and which may significantly restrict developable area and prevent access to site 212. LPA should request easement details from UU to ascertain developable area.	Further consideration required Obtain details of easement from UU to assess developable area
1176	Adam Brennan United Utilities	Not Stated	212		Access to site may be affected by easement issues related to sites 210 and 211 (see separate reps 1174 and 1175)	Further consideration required Pending outcomes of further consideration of UU comments re sites 210 and 211
623	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	212		Site 212 includes Ancient and Semi-Natural Woodland, Altham Clough Wood Biological Heritage Site and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation
1012	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	213		site 213 Land at Lower Barnes St 1 Site remote from highway. Revised capacity should be 0.	Further consideration required Take into account in considering preferred sites for allocation
1178	Adam Brennan United Utilities	Not Stated	216		Site is isolated in relation to wastewater network and requires significant assessment to obtain point of connection. Sites on south west of Great Harwood are on fringe/limits of water supply/sewerage infrastructure networks with limited capacity to support future growth and could result in need to upsize to support growth. A co-ordinated/phased approach to development/infrastructure provision is needed.	Further consideration required Matters to be considered in developing preferred sites in consultation with UU and LLFA
624	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	217		Site 217 includes Evidenced Local Wildlife Site Number 31 and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
940	Ian Smith Historic England	Object	218		<p>Site 218 Land to west of Altham Lane</p> <p>The Bridge over Leeds-Liverpool Canal at the south-eastern corner of this site is a Grade II Listed Building. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to the setting of this building.</p> <p>Detailed comments relating to requirements of NPPF and the 1990 Act regarding conserving heritage assets, considering impacts of development on the asset and desirability of preserving listed buildings etc. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of the asset and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
788	Derek Glover	Object	219		<p>Objection to proposed housing on the site. The land is located in the Green Belt and was refused by the Planning Inspector of the 1996 Local Plan as an Area of Special Restraint on the basis of narrow access off Back Lane. Traffic and congestion issues have worsened over the last 23 years. Extract from the 1996 Local Plan Public Inquiry Inspector's report is attached which states that acquisition of private land would be likely to be required to resolve access constraints.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
753	Roy Breare	Object	219		<p>Objects in relation to Green Belt land, this site was considered in 1996 at the last Local Plan as a potential Area of Special Restraint. The inspector considered that the land fulfilled the purposes of green belt land and that this should continue and refused its ASR proposed status by the Council. Also he identified formidable difficulties (in land acquisition and securing finances) in resolving highway network constraints to the site. Representee provides lengthy supporting letter outlining existing highways use and access (3 pages) emphasising that access is totally unsatisfactory.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
1201	Sport England	Object	219		<p>Allocation of this site would need to demonstrate how it complies with the NPPF (para 96-97) and Sport England's Playing Fields Policy (i.e. loss or prejudice of use of land meeting one or more of five specific exceptions). The site lies close to Baxenden Cricket Club which could have a detrimental impact on cricket if developed. The LA is advised to consider the risk of ball strike from the cricket pitch if developed.</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>

**Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)**

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
723	Peter Wilkinson	Object	219		Objections remain from previous proposals to develop this site, relating to poor access, current traffic issues and further reduction of green belt. Brownfield sites would best meet future development needs.	Further consideration required Take into account in considering preferred sites for allocation
625	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	Object	220		Site 220 includes Local Wildlife Site Number 23, Evidenced Local Wildlife Site Number 31 and deciduous woodland which is listed on the Priority Habitat Inventory. LWT objects unless sites and habitats are avoided/excluded from development and are enhanced through positive management that is made a condition of planning approval. The mitigation hierarchy should be applied i.e. a) Avoidance, b) Mitigation, c) Compensation, and d) Enhancement. If developed, net gains must be delivered in line with NPPF paras 32, 170, 171 and 174.	Further consideration required Take into account in considering preferred sites for allocation
1172	Adam Brennan United Utilities	Not Stated	223		UU has records of wastewater network issues in the area and have preference for development to be located in alternative location as a range of sites are being considered at this stage.	Further consideration required Matters to be considered in developing preferred sites in consultation with UU and LLFA
976	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	223		site 223 land north of Haslingden Road multiple titles and proximity to chicken farm. Revised capacity should be 50.	Further consideration required Take into account in considering preferred sites for allocation
977	Rachael Graham Persimmon Homes (Lancashire)	Not Stated	224		site 224 land east of Haslingden Road multiple titles and proximity to chicken farm. Revised capacity should be 30.	Further consideration required Take into account in considering preferred sites for allocation

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
949	Ian Smith Historic England	Object	228		<p>Site 228 land between Blackburn Rd and M65 slipway Whitebirk Moss Farmhouse and Whitebirk North Farmhouse to the north of this site are Grade II Listed Buildings. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to their significance.</p> <p>Detailed comments relating to requirements of NPPF and Planning Act Act regarding conserving heritage assets, considering impact of development on their significance and setting and desirability of preserving listed buildings. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of heritage assets and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
837	Warren Hilton Highways England	General Comment	228		<p>Concern of multiple sites proposed around and on the approaches to J6 - likely access arrangements onto the roundabout (sites 106, 169, 88, 105, 228, 229 and 230) and the possibility that multiple sites beyond these could share the same connection onto the roundabout, which already has five arms (two carrying M65 exit slips).</p>	<p>Further consideration required</p> <p>Further consultation to take place with Highways England and further evidence on Transport matters to be undertaken prior to considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
950	Ian Smith Historic England	Object	229		<p>Site 229 land between Blackburn Rd, Sidebeet Lane, L&amp;L Canal Whitebirk Moss Farmhouse and Whitebirk North Farmhouse to the south of this site are Grade II Listed Buildings. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to their significance.</p> <p>Detailed comments relating to requirements of NPPF and Planning Act Act regarding conserving heritage assets, considering impact of development on their significance and setting and desirability of preserving listed buildings. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of heritage assets and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
580	Wood and National Grid	General Comment	229		Proposed site is crossed by a National Grid high voltage electricity transmission overhead line - plan provided and advice on statutory clearances and development near overhead lines.	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
838	Warren Hilton Highways England	General Comment	229		Concern of multiple sites proposed around and on the approaches to J6 - likely access arrangements onto the roundabout (sites 106, 169, 88, 105, 228, 229 and 230) and the possibility that multiple sites beyond these could share the same connection onto the roundabout, which already has five arms (two carrying M65 exit slips).	<p>Further consideration required</p> <p>Further consultation to take place with Highways England and further evidence on Transport matters to be undertaken prior to considering preferred sites for allocation</p>

## Representations made to the Site Allocations DPD - ordered by Site Reference (where applicable)

Rep I	Name	Response	Site Ref.	Page Ref	Reasons	Proposed Council Response
951	Ian Smith Historic England	Object	230		<p>Site 230 land north of railway line between Sidebeet Lane and L&amp;L Canal Higher Side Beet Farmhouse and Canal Bridge No.106 to the east of this site are Grade II Listed Buildings. The loss of this currently-undeveloped area and its subsequent development could harm elements which contribute to their significance.</p> <p>Detailed comments relating to requirements of NPPF and Planning Act Act regarding conserving heritage assets, considering impact of development on their significance and setting and desirability of preserving listed buildings. Stage 3 detailed appraisal needs to assess these matters.</p> <p>Suggested changes relate to stage 3 detailed appraisal which should include: a) assessment of contribution of site towards significance of heritage assets and impact of loss of site on significance; b) setting out any measures in plan to remove or reduce harm; c) If harm remains then this site should not be allocated unless there are clear public benefits that outweigh the harm (NPPF, Paragraph 195 or 196).</p> <p>See rep for full details</p>	<p>Further consideration required</p> <p>Take into account in considering preferred sites for allocation</p>
839	Warren Hilton Highways England	General Comment	230		<p>Concern of multiple sites proposed around and on the approaches to J6 - likely access arrangements onto the roundabout (sites 106, 169, 88, 105, 228, 229 and 230) and the possibility that multiple sites beyond these could share the same connection onto the roundabout, which already has five arms (two carrying M65 exit slips).</p>	<p>Further consideration required</p> <p>Further consultation to take place with Highways England and further evidence on Transport matters to be undertaken prior to considering preferred sites for allocation</p>

# Appendix 3: Representations made to the Sustainability Appraisal

Comments and proposed Council response

## Representations made to the Sustainability Appraisal of the Hyndburn Core Strategy Review and Site Allocations DPDs

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1189	Angela Leigh Natural England	General Comment			The environment assessment of the plan (SA and HRA) should consider detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable. NE advises that one of the main issues to be considered in the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation.	Noted Rep will be passed to SA consultants (LUC) for review/response.
1036	Carole Woosey Environment Agency	General Comment			We have reviewed the Sustainability Appraisal in relation to our remit and we have no objections to the approach that has been adopted or the conclusions that have been made.	Noted Rep will be passed to SA consultants (LUC) for review/response.
903	Daniel Owen RPS Consulting Services Ltd	General Comment			Concerns expressed that the outcome scores of the Sustainability Appraisal for Site 80 former Huncoat Power Station are overly negative and does not fully recognise the positive benefits of the site's development. Particular concerns relate to the categorising of the site in relation to accessibility of site and location to sustainable transport links. The Representor has undertaken own assessment and has more positive outcomes in relation to SA objectives 2, 6, 7, 8, 14 & 17.  Although there are trees present on part of site, the whole of the site should be regarded as previously developed.	Noted Rep will be passed to SA consultants (LUC) for review/response.
688	Warren Hilton Highways England	Support			The SA identifies a number of recommendations in relation to SA objective 8: Sustainable transport, including amending Policies CS2, CS5 and CS25. Highways England consider that an appropriate SA has been carried out for this stage in the Local Plan process. However, going forward we would expect to see a full assessment of Huncoat, and that consideration is given to the quality of sustainable transport facility being accessed by users.	Noted Rep will be passed to SA consultants (LUC) for review/response.
687	Warren Hilton Highways England	General Comment			A limitation of the SA is that assessment has only considered the proximity of developments to sustainable transport and not the quality of the facility being accessed. In addition, as the Huncoat Masterplan has not been finalised and adopted by the council, it has not been considered in this SA. Highways England note that it will be taken into consideration at Regulation 19 stage.	Noted Rep will be passed to SA consultants (LUC) for review/response.

**Representations made to the Sustainability Appraisal of the Hyndburn Core Strategy Review and Site Allocations DPDs**

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
810	Ian Smith Historic England	General Comment			<p>Historic England strongly advises that the Council's Conservation Section and archaeological advisors are closely involved throughout the preparation of the SA of the plan. They are best placed to advise on; local historic environment issues and priorities, how the policies or proposals might be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by you the document dated February 2109. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the Plan) where we consider that, despite the SA/SEA, these would have an adverse effect upon the historic environment.</p>	<p>Noted</p> <p>Rep will be passed to SA consultants (LUC) for review/response.</p>

## Representations made to the Sustainability Appraisal of the Hyndburn Core Strategy Review and Site Allocations DPDs

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
809	Ian Smith Historic England	Not Stated			<p>Comments relate to SA of Site Allocations DPD:</p> <p>We also have a number of concerns about the proposed scoring which has been used to evaluate the likely impact upon the historic environment in Appendix 5 (and as illustrated in Appendix 7):-</p> <ul style="list-style-type: none"> <li>o '0' - As the NPPF makes clear, the significance of a heritage asset can be harmed by inappropriate development in its setting and as the NPPG makes clear, the setting of a heritage asset can make a positive contribution to its significance. Consequently, even though a site does not, itself, contain any heritage assets, its development could still result in harm the significance of heritage assets nearby.</li> <li>o '- ' - In some cases, the 'setting' of a heritage asset can be quite extensive encompassing land at some distance from the asset itself. Therefore, a development does not have to be 'adjacent to' the asset to cause it harm.</li> <li>o '- - ' - In some circumstances, the development of sites which are 'neither brownfield or currently developed within a Conservation Area' might be capable of being developed without harming the significance of the Conservation Area. The same is true of such sites where they contain Listed Buildings.</li> </ul> <p>In all these cases, without any detailed evaluation, it would be more appropriate to record the effect as 'uncertain'.</p>	<p>Noted</p> <p>Rep will be passed to SA consultants (LUC) for review/response.</p>

## Representations made to the Sustainability Appraisal of the Hyndburn Core Strategy Review and Site Allocations DPDs

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
808	Ian Smith Historic England	Not Stated			<p>Comments relate to the SA of the Site Allocations DPD:</p> <p>Whilst, in some cases, we would agree with the assumption made in Appendix 5 that the effect of all the proposed allocations against SA Objective 11 (historic environment) will be 'uncertain as it will depend on the design, scale and layout of the development', in the case of currently-undeveloped sites, the impact upon the historic environment may not depend upon these factors at all but, rather, the impact will be dependent upon the contribution which the site in its present form makes to the significance of the heritage assets around them. In such cases it is not so much the form of the development which is the key consideration but, instead, whether or not the principle of the loss of these open areas and their subsequent development is compatible with the appropriate conservation of the heritage assets in its vicinity.</p> <p>In order to reduce the amount of sites where an 'uncertain impact might be scored against SA Objective 11, in the case of currently-undeveloped areas whose development might affect the significance of a heritage asset, the SA should recommend the following:-</p> <p>As part of the Stage 3 Detailed Appraisal:</p> <p>(a) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the heritage assets in its vicinity and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.</p> <p>(b) If it is considered that the development of this site would harm elements which contribute to the significance of any heritage assets, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>© If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of a heritage asset, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 195 or 196).</p>	<p>Noted</p> <p>Rep will be passed to SA consultants (LUC) for review/response.</p>

**Representations made to the Sustainability Appraisal of the Hyndburn Core Strategy Review and Site Allocations DPDs**

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
807	Ian Smith Historic England	Not Stated			Comments relate to the SA of the Core Strategy Given the strategic nature of this document, we would broadly concur with the conclusions about the likely significant effects which the emerging Policies and options might have upon the historic environment.	Noted Rep will be passed to SA consultants (LUC) for review/response.
600	John Lamb The Wildlife Trust for Lancashire, Manchester and North Merseyside	General Comment			135 sites of the 179 for the sustainability appraisal score a single negative for SA Objective 16 (Biodiversity and geodiversity) and 44 sites score a double negative for the SA Objective 16. Therefore appropriate mitigation and compensation will be required to deliver net gains for biodiversity/nature in line with the NPPF (paras 32, 170, 171, 174) for any of the 179 sites taken forward. Site Allocations DPD should adopt the mitigation hierarchy: avoidance; mitigation; compensation; enhancement.	Noted Rep will be passed to SA consultants (LUC) for review/response.

## Appendix 4: Representations made 'Other' documents or matters

Comments and proposed Council response

## Representations made to 'Other' documents or matters

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
1155	Adam Brennan United Utilities	General Comment			General comments regarding aims of UU, that seek to work closely with the Council in preparing the plan, delivering infrastructure and sustainable development and encouraging early contact with applicants through pre-application service.	Noted
963	Rachael Graham Persimmon Homes (Lancashire)	General Comment			Comments on Growth Options and Spatial Options Justification Paper: Spatial Options Detailed comments that the reasoning behind the weightings and adjustments in relation to the distribution of housing between the different spatial areas for the different options is not immediately apparent.	Noted These are set out in footnotes to Figure 1 and 2 (pages 35 and 36) of the Growth Option and Spatial Option Justification Paper.
962	Rachael Graham Persimmon Homes (Lancashire)	Not Stated			Comments on Growth Options and Spatial Options Justification Paper: Growth Options - general support for strategy for growth; - evidence supports medium to high growth option so does not make sense as to why Council has not sought to meet medium housing target of 240 dw/annum; - no evidence to support potential increased housing delivery rates of 75-100 at Huncoat; considered to be unrealistically high, particularly in initial years.  See rep for full details	Noted The HENA study (2018) updated housing figures that related to 'medium' and 'high' growth options. Paragraphs 2.32-2.2.44 provide detailed commentary as to the reasons behind selection of the housing growth option which did not just rely non the evidence base but a number of other factors set out in Table 4 (p13). Housing delivery rates at Huncoat based on advice from Masterplan consultants. Figures will be updated appropriately for Regulation 19 once a final masterplan is agreed.
831	Warren Hilton Highways England	General Comment			Comments relate to the Core Strategy Growth Options and Spatial Options Justification Paper. Highways England note that the masterplanning exercise is underway for Huncoat and that further work has been commissioned on a delivery strategy. They would like to be fully engaged in this work to understand the cumulative impact of the preferred level of growth on the SRN in East Lancashire. Local Plan evidence should be developed in full accordance with the MHCLG guidance entitled 'Transport evidence bases in plan making and decision taking'.	Noted Further engagement to take place with Highways England in relation to the Huncoat masterplan and Publication version Local Plan. Further evidence base work on Transport also still to be undertaken

## Representations made to 'Other' documents or matters

Rep I	Name	Response	Policy Ref.	Page Ref.	Summary of comments / reasons	Proposed Council Response
778	Jeanette Lord Allsprings Development LTD	General Comment			Consultee as landowner has had no consultation from the Council on the CS or SA DPD	Noted  Error in contact details now corrected in Local Plans database
774	Maureen Kenyon	General Comment			Residents in area unaware of Core Strategy and consultation meetings not widely publicised. Process is complicated and those going off hear-say are concerned and more confused. Please make us aware of next steps.	Noted  Contacts in the Local Plan database are directly informed of consultations and will continue to be so. The Council also used community groups, local press, libraries, website and social media to publicise. At the next stage (Publication in 2020), properties immediately adjoining proposed site allocations will also be advised directly.
813	Elizabeth Knox	Object			Residents in other areas were informed by letter of the proposed planning applications. People in the area are mainly elderly so should not be expected to search on line for information, many do not have broadband.	Noted  Contacts in the Local Plan database are directly informed of consultations and will continue to be so. The Council also used community groups, local press, libraries, website and social media to publicise. At the next stage (Publication in 2020), properties immediately adjoining proposed site allocations will also be advised directly.
841	Mohammed Ahmed Lancashire County Council (Environment Directorate)	General Comment	DM4		We recommend that a cumulative impact approach is adopted at a strategic level to develop a retail offer that is supportive of health and wellbeing, and that specific quotas for non-retail uses such as hot food takeaways and betting shops are included as the Development Management DPD is reviewed. We also request that the policy recommendations contained within the Public Health Advisory note on Hot Food Takeaways are included within the Development Management DPD as it is reviewed.	Noted  These are matters to be addressed on review of the DM DPD, any plans for which will be set out in future Local Development Schemes of the Council.

# Agenda Item 7.

<b>REPORT TO:</b>	Cabinet		
<b>DATE:</b>	12 September 2019		
<b>PORTFOLIO:</b>	Cllr Paul Cox - Deputy Leader - Environmental Services		
<b>REPORT AUTHOR:</b>	Helen Dodds – Food and Safety Manager		
<b>TITLE OF REPORT:</b>	Food and Safety Service Plan 2019/20		
<b>EXEMPT REPORT (Local Government Act 1972, Schedule 12A)</b>	<b>No</b>	Not applicable	
<b>KEY DECISION:</b>	<b>No</b>	If yes, date of publication:	

## 1. **Purpose of Report**

- 1.1 To present the 2019/20 Food and Safety Plan to Cabinet for consideration and approval.

## 2. **Recommendations**

- 2.1 That Cabinet approve the proposed Food and Safety Service Plan attached to this report.

## 3. **Reasons for Recommendations and Background**

- 3.1 The Food and Safety Service Plan is a document that is reviewed annually to ensure the service can meet demands and set out priorities for the coming year.
- 3.2 The Plan has been updated to include inspection targets for 2019/20 and includes the following performance indicators;
- to complete all inspections due in 2019/20 in the required timeframes
  - to improve the % number of premises who have a food hygiene rating of zero, 1 or 2 that achieve a level of compliance within 6 months of the initial inspection (hygiene rating of 3 or above)
  - to visit all new premises within 28 days of registration upon receipt by the Council
- 3.3 The Plan details work undertaken in the Borough and current levels of compliance.

3.4 The Plan includes areas of health and safety work which are being undertaken this year in accordance with Health and Safety Executives (HSE) National Code for Local Authorities.

3.5 The Plan provides focus to the team, Councillors, food business operators and consumers. The plan provides information on areas of work outside our statutory function such as our allergen initiative and allergen workshops for food businesses.

**4. Alternative Options considered and Reasons for Rejection**

4.1 Without a Food and Safety Service Plan the team cannot demonstrate the demands of the service against current resources as required by the FSA nor can they meet their statutory requirements.

**5. Consultations**

5.1 Officers in the Food and Safety Team, Executive Director for Environmental Services, Portfolio Holder for Environmental Services and Legal Services have been consulted.

**6. Implications**

<b>Financial implications (including any future financial commitments for the Council)</b>	None
<b>Legal and human rights implications</b>	The Plan and related policy will be applied consistently to food business operators and employers /businesses within the Borough of Hyndburn. The National Food Law Code of Practice requires Local Authorities to produce a food safety plan and to ensure resources meet demands.
<b>Assessment of risk</b>	The plan outlines the demands of the service and current recourses. It provides focus for officers and details work that will be completed this financial year with measurable performance indicators. Therefore meeting statutory requirements. The risk of not implementing the plan is that the Council is deemed not to be able to meet statutory requirements by the Food Standards Agency (FSA) which could potentially result in a full audit by the FSA and the threat of 'special measures' which would have a negative impact on the Food and

	Safety Team and Hyndburn Council. The plan protects public safety and the residents of Hyndburn.
<b>Equality and diversity implications</b> <i>A <a href="#">Customer First Analysis</a> should be completed in relation to policy decisions and should be attached as an appendix to the report.</i>	See attached

7. **Local Government (Access to Information) Act 1985:**  
**List of Background Papers**

N/A

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# HYNDBURN

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The place to be  
an excellent council

HYNDBURN BOROUGH COUNCIL

FOOD AND SAFETY TEAM

SERVICE PLAN

2019/20

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## 1.0 INTRODUCTION

### 1.1 Hyndburn Food Service Plan

This document is the Hyndburn Food and Safety Service Plan and includes reference to other relevant documents. It sets out:

- Links with corporate priorities
- A profile of the Borough including the political and managerial arrangements
- The demands on the service
- Summary of service activity in relation to premises inspection, complaints investigation, advice, sampling, food safety incidents, liaison arrangements and promotional activities
- The resources deployed to meet these demands
- Relevant performance indicators

## 2.0 SERVICE AIMS AND OBJECTIVES

### 2.1 Service Aims

To contribute to Hyndburn Borough Council's corporate objectives identified in the Corporate Strategy 2018 to 2023

#### **Driving growth and prosperity in Hyndburn**

- Supporting local food businesses and Small and Medium Enterprises to grow and flourish.

#### **Working to deliver a better quality of life**

- Inspecting food businesses to ensure that food is produced in a safe and hygienic manner
- Providing food hygiene ratings for public access so consumers can make informed choices
- Controlling premises where an imminent risk to health exists, thereby protecting the general public
- Supporting the withdrawal of food identified by way of the Food Standards Agency Food Alert scheme
- Contributing to the wider public health agenda including working with external bodies

#### **Delivering efficient customer focused services**

- Food hygiene inspections carried out in line with national code of practice
- Respond and investigate complaints/accidents made by the public
- Carry out advice visits on request

#### **Improving efficiency through use of technology**

- Improving efficiency within the team by the use of mobile technology

### 3.0 BACKGROUND.

#### 3.1 Profile of the Local Authority

Hyndburn Borough Council was formed in 1974 by the amalgamation of the Borough of Accrington, the Urban Districts of Church, Clayton-le-Moors, Great Harwood, Oswaldtwistle and Rishton, and part of the Burnley Rural District. The name Accrington is quite commonly known to derive from "acorn town" or "town where acorns are found". As well as Accrington, Hyndburn consists of the following townships Great Harwood, Clayton-le-Moors, Rishton and Oswaldtwistle.

The Council is one of 12 District Councils, 1 County Council and 2 Unitary Authorities within the County of Lancashire. Within the Borough, some functions relating to food safety are the responsibility of Lancashire County Council e.g. Trading Standards and Food Standards inspections.

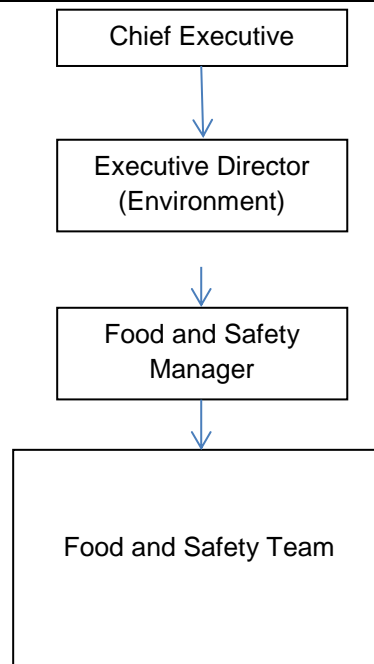
In terms of land area, Hyndburn is the smallest of the 14 authorities in the broader Lancashire area. In common with some of the other districts in East Lancashire, there are significant issues with regard to the quality and price of housing, net population migration, health, job creation and areas of severe deprivation.

The authority has a tendency towards a younger population and fewer people of pensionable age than is the average for England and Wales. The ethnic mix is similar to other authorities in East Lancashire, predominantly white and the largest minority ethnic group is Pakistani. The population in Hyndburn had remained almost static in the decade to the 2011 Census.

The district has around 36,500 dwellings, 86% are owner occupied or private rented. Hyndburn, like other East Lancashire authorities, has a very high proportion of its housing stock in council tax band A. The authority also has a high percentage of vacant dwellings.

In Hyndburn there still continues to be a bias towards a larger proportion of employees in the manufacturing sector than is the national norm and a lower proportion of jobs in the service sector. There is a diverse range of food businesses within Hyndburn from single run operations to large scale food manufacturers. The 2015 Indices of Deprivation reveals that Hyndburn was the 28th most deprived area out of 326 districts and unitary authorities in England, by the rank of average rank measure. In total, 25% of the lower super output areas in the authority were in the 10% most deprived in the country.

### 3.2 Organisational Structure.



Within Environmental Services, Food Controls are delivered by the Food and Safety Team. This section comprises:

- Food and Safety Manager
- Food and Safety Officers (3 FTE)

The Food and Safety Section is responsible for food safety, occupational health and safety, infectious disease control, public health licensing and street trading consents.

### 3.3 Political arrangements

The political arrangements for the Borough are:

35 Local District Councillors  
1 Parish Council  
1 Member of Parliament

The political composition of the Council is currently Labour 26, Conservative 9.

The service comes under the Environmental Services Portfolio

### 3.4 Scope of the Food and Safety Section

As a Borough Council, the Authority is responsible for a range of food safety duties under the Food Safety Act 1990 and the Food Safety and Hygiene (England) Regulations 2013. Food Standards and Animal Feeding Stuffs are the responsibility of the Lancashire County Council Trading Standards Division.

The Food and Safety Section also delivers the following services alongside food safety:

- Occupational Health and Safety
- Communicable Diseases Control
- Public Health licensing e.g. tattoo premises
- Street Trading Consents

### 3.5 Demands on the Food Service

In relation to food safety, the area contains a mix of manufacturing, retail and catering premises. Catering and retail are the dominant sectors within this mix. The businesses are predominantly small to medium sized establishments. The Borough has a traditional cross-section of food businesses:

	No. of premises at 1 <sup>st</sup> April 2018	No. of premises at 1 <sup>st</sup> April 2019
Total number of Food Premises	766	788
Categories A-C (High Risk)	165	250
Categories D-E (Others)	598	519
Non Rated	3	4
Caring Premises	116	109
Distributor/Transporter	8	6
Hotel/Guest House	6	4
Manufacturer/Packer	17	16
Mobile Food Unit	31	34
Pub/Club	108	101
Restaurant/café/canteen	114	126
Restaurants and Caterers – other	30	48
Retailer/other	32	34
School/college	55	54
Small Retailer	124	126
Supermarket/Hypermarket	19	19
Take Away	106	111

External factors impacting on Food Safety enforcement service delivery:

- Seven day local economy
- Transition from manufacturing to service industry economy
- Turn-over of occupancy/use
- High number of fast food outlets
- Cross boundary/Cross County nature of food crime issues
- Nationally set priorities and initiatives, programmes etc.

The Council had adopted the following Performance Indicators in relation to food premises interventions:

**PI for 2019/20**

To undertake all scheduled food hygiene inspections for 2019/20

Food premises that scored 0, 1, or 2 in the Food Hygiene Rating Scheme are improved to a minimum rating of 3 within a 6 month period from the date of inspection. Non-compliant food businesses will be progressed in accordance with the enforcement policy where appropriate.

Initial inspections should take place within 28 days of registration or from when the authority becomes aware that the establishment is in operation

**3.6 Service Delivery arrangements**

Address:

Environmental Services  
Willows Lane Depot  
Willows Lane  
Accrington  
BB5 0RT

Telephone: 01254 388 111

Web: [www.Hyndburnbc.gov.uk](http://www.Hyndburnbc.gov.uk)

The Councils main telephone contact centre opening hours: 09.00 – 17.00 Monday – Friday

**3.7 Policy and standards**

Delivery of Food Controls is carried out in accordance with national procedures and guidance including:

- Regulators' Code
- Food Law Code of Practice
- Food Law Practice Guidance
- Food Standards Agency Guidance

In addition, the council has adopted the following relevant policies;

- Compliance and Enforcement Policy

- Food Complaint Policy
- Sampling Policy
- Procedure for Internal Monitoring of Food Safety Operations
- Inspections and re-visit policy

Copies of the documents are available upon request are available on the Council's website.

## 4.0 SERVICE DELIVERY

### 4.1 Interventions at Food establishments

The Service will undertake a programme of comprehensive and targeted interventions at food premises in accordance with the Food Law Code of Practice, to ensure compliance with relevant legislation and the promotion of best practice.

Civica APP is used to maintain the premises database. The following is a summary of the current Food Business risk rating profile for Hyndburn:

		<b>Number of active Food Businesses 1<sup>st</sup> April 2018</b>	<b>Number of active Food Businesses 1<sup>st</sup> April 2019</b>
<b>Risk Category (Inspection frequency)</b>	A (at least every 6 months)	13	6
	B (at least every 12 months)	47	61
	C (at least every 18 months)	105	182
	D (at least every 24 months)	295	248
	E (at least every 36 months)	303	271
	Unrated	3	24 (20 within 28 days / 4 registered but not active)
	<b>TOTAL</b>	<b>766</b>	<b>788</b>

The following table outlines the provisional intervention programme for the financial year 2019/20:

<b>Risk Category</b>	<b>No. interventions due between 1<sup>st</sup> April 2018 – 31<sup>st</sup> March 19</b>	<b>No. interventions due between 1<sup>st</sup> April 2019– 31<sup>st</sup> March 2020</b>
<b>A</b>	13	6
<b>B</b>	47	61
<b>C</b>	47	97
<b>D</b>	173	102
<b>E</b>	103	92

### **Food hygiene rating & non-complaint premises**

The Council has adopted the National Food Hygiene Rating Scheme. The rating profile is as follows:

<b>Rating</b>	<b>Number of premises 1<sup>st</sup> April 2017</b>	<b>Number of premises 1<sup>st</sup> April 2018</b>	<b>Number of premises 1<sup>st</sup> April 2019</b>
<b>0</b>	17	4	7
<b>1</b>	80	27	30
<b>2</b>	39	18	39
<b>3</b>	20	50	84
<b>4</b>	126	149	209
<b>5</b>	363	404	299
<b>Awaiting inspection</b>	13	3	4
<b>Exempt</b>	36	34	27
<b>% Compliance</b>	<b>79%</b>	<b>92%</b>	<b>88.6%</b>

11.4 % of premises which is a total of 76 food businesses were non-compliant as of the 1<sup>st</sup> April 2019. As of the 12<sup>th</sup> August 2019 this number had reduced to 5.8% which is a total of 40 food businesses. Therefore 94.1% of premises are compliant.

Re-visits are completed to non-compliant premises. In 2018/19 183 re-visits were carried out with an additional 61 re-assessment visits taking place.

In 2018/19 we also received 99 new food business registration forms for new business owners in existing premises which therefore require inspections and require additional programming into the annual work plan.

Enforcement action will be taken on a graduated approach in accordance with the Enforcement Policy.

Re-visits will be carried out free of charge until March 2020 after which charging for re-visits will be considered in line with national guidance and council member's agreement.

Free allergen workshops for catering premises are taking place throughout 2019/20. There is one workshop scheduled per month to take place until December 2019. To date 316 food handlers/business owners have attended the workshops. Five workshops are still to take place with a further 200 delegates booked to attend.

Allergen compliance remains a focus during routine inspections at catering premises. Best practice developed in Hyndburn and Lancashire is currently being cascaded nationally.

### **Competency**

Officer competencies are managed by means of the Corporate Performance Development Review process with individual training and development records being maintained. Officers have completed a competency matrix following the Food Law Code of Practice. This is reviewed annually.

Specialised training previously undertaken within the section includes:

- Lead auditor training in compliance with ISO 9001
- HACCP Evaluation
- Dairy hygiene
- Sous-vide and low temperature cooking or processing
- Vacuum and modified atmosphere packing
- Evidence Gathering and Investigation skills
- Regulatory and legal skill competencies
- E coli/control of cross contamination
- Annex 5 risk rating consistency
- Microbiological Criteria for Food with an emphasis on *Listeria monocytogenes*
- Approved establishments
- Food Allergens
- Shelf life testing

### **4.2 Food and Food Premises Complaints**

It is the policy of Hyndburn Borough Council to give a first response within 6 working days to all food and food premises complaints/service requests.

	<b>Actual for 2018/19</b>	<b>Estimated</b>
Estimated number of food premises complaints for 2019/20	138	125

Complaints shall be investigated in accordance with the above.

### **4.3 Primary Authority Scheme**

The Authority is committed to supporting local businesses. Currently, Hyndburn Borough Council does not have any Primary Authority Partnerships, consideration would be given on a

case by case basis should a company wish to enter into a partnership with Hyndburn Borough Council.

#### **4.4 Advice to Businesses**

The Authority has a policy of offering advice to any business which has trading premises within our area unless the trader has entered into a Primary Authority or Home Authority arrangement with another Local Authority. Initial advice will be normally limited to telephone advice, provision of advisory material or sign-posting to relevant sources of information. Advisory visits will be undertaken at the discretion of the officers prior to food businesses opening.

#### **4.5 Food Sampling**

Programmed food sampling will be carried out; this will be in liaison and co-ordination with Public Health England in accordance with an agreed sampling programme. Sampling for 2019/20 include focus on soil bearing vegetables, sandwiches at the end of shelf life, premises hygiene including re-usable and disposable cloths and premises with no dishwasher and multi-use sinks.

Other sampling which may be carried out includes:

- Sampling as part of an official control intervention
- In response to complaints
- Where local intelligence indicates a potential risk to health, and sampling forms part of the service's response

All formal food samples will be submitted to the Lancashire County Public Analyst for compositional analysis or to the Public Health England Food, Water and Environmental Laboratory Service for microbiological examination.

#### **4.6. Control and Investigation of Outbreaks and Food Related Infectious Disease**

Hyndburn Council aims to ensure the efficient investigation of notified infectious diseases or suspected infectious diseases in order to minimise the risk of spread and if possible to locate the source of a disease. Notifications may arise as formal notifications from Public Health England, GPs or laboratory notifications. Investigations are carried out by either the Council or Public Health England depending on the nature of the specific disease notification.

Hyndburn Council will take a risk-based approach to suspected viral outbreaks. Environmental Health will only carry out intervention or further investigations where:

1. The risk assessment indicates that there is a suspected food/food handler link in the source of the outbreak or significant further spread of the infection; or
2. The risk assessment indicates that food/food handlers are not significant features in the outbreak but the circumstances indicate a need for regulatory intervention (e.g. under HASAWA, Health Protection Regulations etc.) which will be considered in liaison with other regulators as appropriate (e.g. CQC, HSE). In these cases the EH intervention may focus on regulatory action for non-compliance with relevant legislation as opposed to following up individual cases or pursuing specimens.

The Council has a Joint Major Outbreak Plan for Managing an Outbreak of Food Poisoning or Communicable Disease in the Community developed in conjunction with partner agencies.

Typical demand and resource requirements are:

	<b>Actual for 2018/19</b>	<b>Estimated for 2019/20</b>
Estimated number of notifications of food related infectious disease amongst Hyndburn residents (this could be due to foreign travel, leisure activities, food consumption etc.)	116	100
Estimated number of outbreaks of suspected cases	0	1

#### **4.7 Food Safety Incidents**

It is the policy of Hyndburn Borough Council to comply with Food Law Act Code of Practice (England) in relation to the handling of Food Hazard Warnings and Food Safety Incidents.

The following predicted number of notifications is based on the current level of activity

	<b>Actual for 2018/19</b>	<b>Estimated 2019/20</b>
Estimated number of National Food Alerts/Hazard Warnings issued by the FSA:	76	75
Estimated number of National Allergen Alerts/Hazard Warnings issues by the FSA:	129	150

#### **4.8 Liaison with Other Organisations**

Hyndburn Council works with other enforcement agencies, partners and other stakeholders for the purpose of developing consistency of enforcement, openness and transparency. The following table details the regular, on-going liaison with external partners:

<b>Partner Organisation type</b>	<b>Brief description</b>
Other Local Authorities/Scientific support	Environmental Health Lancashire Food Liaison Group – Enforcement issues, sampling, policies, best practice, training, inter-authority audits etc.

	<p>East Lancashire Environmental Health Services – Joint working, resource sharing etc.</p> <p>Lancashire County Council Trading Standards – Food liaison.</p> <p>Lancashire County Council Public Health – Public Health Issues and Clinical Commissioning Groups.</p> <p>Lancashire County Council Public Analyst – Chemical analysis etc.</p>
Professional bodies and Agencies	<p>Public Health England – Food Sampling and examination, Communicable Disease control.</p> <p>Chartered Institute of Environmental Health – professional practice, consultation, training.</p> <p>Food Standards Agency – statutory plans, guidance, training, annual returns, consistency of enforcement, best practice, training.</p> <p>Better Regulation Delivery Office – Primary Authority support.</p> <p>Local Government Regulation – best practice.</p>

Within Hyndburn Council links include:

Service Grouping	Role
Corporate	Health inequalities, Policy, Legal Services, Democratic Services, Waste Management, Pest Control, Safeguarding Officer
Strategic	Planning and Building Control, Licensing, Lancashire Fire & Rescue, HMRC, Immigration Service

#### 4.9 Health Inequalities and Health Promotion.

Hyndburn Council recognises the need to work with partners on a range of health inequalities and their social determinants. The Council is committed to working with partners through the Hyndburn Health and Well Being Group to deliver the agreed Health and Wellbeing Strategy Plan.

To protect the interests and welfare of consumers and traders and we will promote consumer education by signposting to appropriate reference sources.

#### 4.10 Occupational Health and Safety

In accordance with Health and Safety Executive LAC 67/2 V8 Hyndburn Council have prioritised interventions for 2019/20 thus meeting the requirements of the National Local Authority Enforcement Code. The following areas will be the focus of health and safety

interventions for the next 12 months;

- Dough rollers in catering premises. Information and guidance will be forwarded to all takeaway type premises where dough rollers may be used. Routine inspections will identify dough rollers and associated guarding and action will be taken in accordance with the enforcement policy where any non-compliance is identified.
- Warehousing – any accidents reported via the Report of Injuries, Disease and Dangerous Occurrence Regulations (RIDDOR) received from warehouse premises will be investigated with falls from height, workplace transport reviewed during investigation.

#### 4.11 Consents / Licences

Hyndburn Council issue Street Trading consents to mobile vehicles and ice cream vehicles trading in the borough on an annual basis.

Hyndburn Council issues Licences for skin piercing such as tattoo, semi-permanent make –up and skin piercing.

	Actual for 2018/19	Estimated 2019/20
Street Trading Consents	15	10
Skin Piercing Licencing	15	10

## 5.0 RESOURCES

### 5.1 Financial Allocation

The total costs of providing the Food Safety Service for 2019/20 are £289,040. This estimate comprises:

Details	2019/20 estimate
4 FTE plus on costs, equipment, IT and support services	£289,040

### 5.2 Staffing allocation

The Food Hygiene functions are co-ordinated by the Food and Safety Manager. The service also carries out a wide range of associated functions including Health and Safety, Infectious Disease Investigations, Street Trading Consents and Events.

The officers involved in providing food hygiene work are legally qualified, have the appropriate experience and competencies, have knowledge of the Borough's food business environment and receive at least 20 hours Continuing Professional Development per annum, as required by the FSA's Code of Practice. They consist of:

- 1 X Food and Safety Manager
- 80 % of time is spent on Food Hygiene Work

- 3 X Food and Safety Officers - 90 % of time is spent on Food Hygiene Work

of which:

- 4 X Officers qualified to inspect Cat A - B premises:
- 4 X Officers qualified to inspect Cat C – E premises:

The remit of all officers is food safety, health and safety, infectious diseases and administration duties.

Two members of the team have returned from maternity leave and have reduced their hours until March 2020. These hours are being backfilled by a contractor on a 12 month contract. One member of the team is currently on maternity leave until January 2020. This has been covered by a member of staff on a fixed term contract covering the period of maternity leave.

The available resources will meet the demands of the service.

### **5.3 Staff Development**

All Officers receive an annual performance development review which includes a review of training and development needs.

As required under the Code of Practice a minimum of 10 core food related hours per Officer per year is undertaken. Training is provided to address needs identified within the Council's Performance Development Review framework, the Regulators Development Needs Assessment (RDNA) tool and FSA competency framework. Additional training will be resourced subject to emerging demands. Training requirements provisionally identified for 2019/20 include:

- Regulatory consistency
- Sampling
- Shelf life testing and microbiology
- Food Fraud

A documented procedure is maintained for recording qualifications, training and individual competencies which are reviewed annually as part of the Performance Management process.

## **6.0 QUALITY ASSESSMENT AND SERVICE REVIEW**

### **6.1 Quality Assessment**

In order to assist with consistent quality of service delivery, the Service continues to:

- Develop an internal non-accredited quality management system
- Participate in Inter-authority auditing as available
- Participate in regional peer-review processes as available

### **6.2 Review against the Service Plan**

Progress against this Service Plan is reviewed at the end of each months and quarter by the Food and Safety Manager.

The Council operates the following performance indicators which is reviewed quarterly and reported to the Executive Director for Environmental Services who will report to the Corporate Management Team on a 6 monthly frequency:

Key Performance Indicators	Target
To undertake all scheduled food hygiene inspections for 2019/20	100%
The number of food premises (Cat A-D) that scored 0, 1, or 2 in the Food Hygiene Rating Scheme are improved to a minimum rating of 3 within a 6 month period from the date of inspection.	100%
Initial inspections should take place within 28 days of registration or from when the authority becomes aware that the establishment is in operation	100%
Key Performance Indicators were met in 2018/19.	

### 6.3 Variance from the Service Plan

As part of the quarterly review process, consideration will be given to any variation against this service plan, the reasons for any variance and possible corrective measures.

### 6.4 Areas for Development

At the commencement of each financial year, consideration is given to areas for service development and improvement. For the current financial year this includes:

- Mobile working and improved administration efficiencies
- Maintaining allergen workshops within the Borough
- Maintaining improved compliance levels across the Borough
- Website maintenance

### 6.5 Review of 2019/20 Plan

The Service Plan for 2019/20 will be reviewed on a quarterly basis by the Food and Safety Manager.

Any variations from the plan will be assessed and any corrective actions will be agreed and implemented in conjunction with the Executive Director for Environmental Services.



## Hyndburn Borough Council

### Customer First Analysis

#### What is it for?

Our corporate values include putting the customer first, providing opportunities for bright futures and narrowing inequality across the Borough.

From 1 April 2011, a new legal duty applies to all public authorities. It covers these protected characteristics:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- gender;
- sexual orientation; and, for some aspects,
- marriage and civil partnerships.

The duty means that – as previously - we should analyse the effect of existing and new policies and practices on equality. It does not specify how we should do this. However, legal cases on the meaning of the previous general equality duties make it clear that we must carry out the analysis **before making the relevant policy decision**, and include consideration as to whether we can reduce any detrimental impact.

The framework overleaf – our Customer First Analysis - is suggested when making a written record of the analysis. This replaces Equality Impact Assessments.

The Analysis should be **proportionate** to the policy decision being taken. In some cases the written record will be a quick set of bullet points or notes under each heading, to deal with any questions which are relevant (or briefly explain why if they aren't). Others will need to be much more detailed. A meaningful Analysis will help the Council make the best decision or formulate a policy which best meets our customers' needs.

Please return completed Customer First Analyses to Shaheen Amaan in Human Resources. Shaheen can guide you through the process if this would be helpful.

If you have any suggestions for improving this process, please let me know.

Kirsten Burnett  
Head of HR

## Customer First Analysis

### 1. Purpose

- What are you trying to achieve with the policy / service / function?

The food service plan sets out what work will be completed by the food team in 2019/20 and how resources will meet the demand. Having a plan meets statutory requirements expected by the Food Standards Agency. The plan also sets measurable performance indicators for the service.

- Who defines and manages it?

Food and Safety Officers / Food and Safety Manager and Executive Director for Environmental Services.

- Who do you intend to benefit from it and how?

Food Safety Officers and the Service will benefit from having a work plan which sets out demands and resources and performance indicators will provide focus for work priorities.

Councillors, food business operators, consumers, employers and employees across the borough will benefit from a consistent approach with improved understanding of the demands on the service, what the service will deliver to the end of the financial year and priorities / objectives.

- What could prevent people from getting the most out of the policy / service / function?

Lack of awareness from the food business operators, consumers, employers and employees.  
Lack of consistency between officers.  
Lack of buy in / implementation across the team.

- How will you get your customers involved in the analysis and how will you tell people about it?

Cabinet support and approval, member bulletin, Food and Safety Officer cascade, training and monitoring.

### 2. Evidence

- How will you know if the policy delivers its intended outcome / benefits?

The inspection programme is managed. Performance indicators are met and inspection frequencies are maintained. Improved consistency between officers. The number of non-compliant premises are reduced. The food service plan is monitored on a monthly, quarterly and annual frequency, reports maintained and communicated to the team / head of service.

- How satisfied are your customers and how do you know?

Statutory requirement to work to a food service plan and annual return to Food Standards Agency.

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- What existing data do you have on the people that use the service and the wider population?

Database maintained of all business premises, inspections / interventions / service requests, accident investigations etc.

- What other information would it be useful to have? How could you get this?

N/A

- Are you breaking down data by equality groups where relevant (such as by gender, age, disability, ethnicity, sexual orientation, marital status, religion and belief, pregnancy and maternity)?

N/A

- Are you using partners, stakeholders, and councillors to get information and feedback?

N/A

### 3. **Impact**

- Are some people benefiting more – or less - than others? If so, why might this be?

The procedure will be applied consistently and fairly across all groups within the Borough.

### 4. **Actions**

The food service plan has been agreed with Food and Safety Officers, Executive Director for Environmental Services and Cabinet Support / approval.

The plan will be incorporated into the Services existing policies and procedures and service plan.

Review in light of a change in legislation or Council policy.

**Don't forget to return your written record to HR.**

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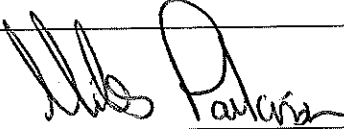



## HYNDBURN BOROUGH COUNCIL

### APPROVAL FOR URGENT EXECUTIVE (CABINET) DECISION

#### (Executive Procedure Rule B16)

#### Summary and Approvals

1. **Title of Report**  
Mercer Park Skate Boarding Facility
  
2. **Report Author**  
Craig Haraben
  
3. **Purpose of Report**  
To inform Cabinet of progress in relation to the proposal to refurbish and improve the skate boarding facility at Mercer Park in Clayton le Moors (please see attached Cabinet Report)
  
4. **Decision requested**  
That Cabinet approves the recommendations (2.1 to 2.4) set out in the attached Cabinet Report
  
5. **Reason for Urgency**  
The first report relating to this project went to Cabinet in July 2018 and required a further report to be brought to Cabinet once funding was secured. Timescales for delivering the finished project are tight as one of the funders requires the project to be completed by the end of September 2019. As such waiting for the next Cabinet meeting on 12 September would mean missing the end of September funding deadline.
  
6. **Approvals of Members and Officers**

Designation	Signature to give Approval
<b><u>Elected Members</u></b>	
Leader of the Council	
Deputy Leader of the Council	
Portfolio Holder	
Mayor (to agree to exempt from call-in)	
<b><u>Officers</u></b>	
Chief Executive	
Deputy Chief Executive (only in the absence of the Chief Executive or if the Chief Executive is the decision taker)	

Monitoring Officer (only in the absence of the Chief Executive and Deputy Chief Executive or if one is absent and the other is the decision taker)	
Chief Officer/Head of Service	<i>Craig Halli</i>

7. **Date of Decision (when finally approved):** *20<sup>th</sup> August 2019*

<b>REPORT TO:</b>		Cabinet	
<b>DATE:</b>		12 September 2019	
<b>PORTFOLIO:</b>		Cllr Paul Cox – Deputy leader - Environmental Services	
<b>REPORT AUTHOR:</b>		Craig Haraben (Deputy Head of Environmental Services)	
<b>TITLE OF REPORT:</b>		Mercer Park Skate Boarding Facility	
<b>EXEMPT REPORT (Local Government Act 1972, Schedule 12A)</b>	<b>No</b>	Not applicable	
<b>KEY DECISION:</b>	<b>No</b>	If yes, date of publication:	

### 1. **Purpose of Report**

- 1.1 To inform Cabinet of progress in relation to the proposal to refurbish and improve the skate boarding facility at Mercer Park in Clayton le Moors

### 2. **Recommendations**

- 2.1 Cabinet continues to support the refurbishment and improvement of the skate boarding facility in Mercer Park as outlined in the report
- 2.2 Cabinet agrees to the Council being the accountable body in respect of the project funding in accordance with the terms and conditions of relevant funding bodies
- 2.3 Cabinet delegates authority to the Deputy Head of Environmental Services in consultation with the Portfolio Holder to take all reasonable steps to implement and complete the project, entering into necessary contractual agreements and obtaining all necessary permissions and consents
- 2.4 Cabinet agrees to waive the contract procedure rules to engage Proffitts CIC as Project Manager for the delivery phase of this scheme, as set out in paragraphs 3.5 & 3.6 of the report.

### 3. **Reasons for Recommendations and Background**

- 3.1 The Friends of Mercer Park are the longest standing Friends of Group in the Borough associated with a park. Over the years the Friends of Mercer Park have worked with the Council to undertake numerous community projects and fund raising events which have benefitted the park.
- 3.2 The outcome of a consultation undertaken by the Friends of Mercer Park showed that local residents and young people would like to see the refurbishment of the skate park facilities in Mercer Park.
- 3.3 Funding bids were submitted to relevant funding bodies between July and December 2018. The outcome was that funding bids to Sport England, Lancashire Environment Fund and Tesco were all successful.
- 3.4 In addition to this external funding being secured Cabinet agreed to contribute £25,000 to the project via the capital programme for financial year 19/20, Friends of Mercer Park contributed £3,000 and Lancashire County Council contributed £600.
- 3.5 Proffitts CIC are a community interest company who have expertise in green space improvement projects and audience development, submitted the funding bids as a co-applicant with the Council, at no cost to the Council. This is because the mechanism used by the funding bodies allows any fees for time spent on developing a funding bid to be claimed directly from them during the delivery phase of the project.
- 3.6 The Council and Proffitts CIC were co-applicants in securing the funding for this project and Proffitts CIC has the necessary skills fulfil the Project Manager role. As such, the Council intends for Proffitts CIC to act as Project Manager for the delivery phase of the Project.
- 3.7 The refurbished and improved skate boarding facility will provide a much better resource for the young people of the Borough to use (see attached plan).
- 3.8 A tender exercise has been undertaken in line with the Council's contract procedure rules and a successful contractor appointed. The new skate facility is expected to be completed by the end of September 2019.

#### **4. Alternative Options considered and Reasons for Rejection**

- 4.1 Do not continue with the delivery stage of skate park refurbishment in Mercer Park Clayton le Moors. This is not recommended as grant funding has now been secured and this work can be undertaken as per the wishes of the local community.

#### **5. Consultations**

- 5.1 Portfolio Holder, Friends of Mercer Park, local residents, local Councillors, Mercer 1842 and the Parks & Cemetery service have been consulted in relation to this project.

#### **6. Implications**

<p><b>Financial implications (including any future financial commitments for the Council)</b></p>	<p>On-going maintenance will be contained within existing Parks service budgets.</p> <p>Funding for the project has been secured from a number of grant funding bodies as follows:</p> <p>Sport England £50,000  Lancashire Environment Fund £50,000  Friends of Mercer Park £3,000  Tesco £1,000  Lancashire County Council £600</p> <p>It has been approved in the 19/20 budget setting process that the Council will provide £25,000 match funding towards this project. This means a total of £129,600 will be spent on this project.</p>
<p><b>Legal and human rights implications</b></p>	<p>The Council will need to enter into agreements with the grant funding organisations supporting this project. The Council as accountable body for the grant funding, will need to enter into agreements with the funding bodies on their standard terms and conditions.</p>
<p><b>Assessment of risk</b></p>	<p>The Council will act as accountable body for the scheme. The Council will use its contract procedure rules to ensure all contactors engaged to undertake the refurbishment work offer value for money for the project. While this is low risk it would mean the Council is liable for any clawback should the grant funding not be used for its intended purpose.</p> <p>There is limited financial risk as a tender exercise has been undertaken to ensure that the project is contained within the available budget. Designs will be amended in the event of any cost increases to ensure the project stays within budget.</p> <p>All design work has been undertaken by suitably qualified designers and projects</p>

	managers. As such all work meets required standards.
<b>Equality and diversity implications</b>	A customer first analysis is attached

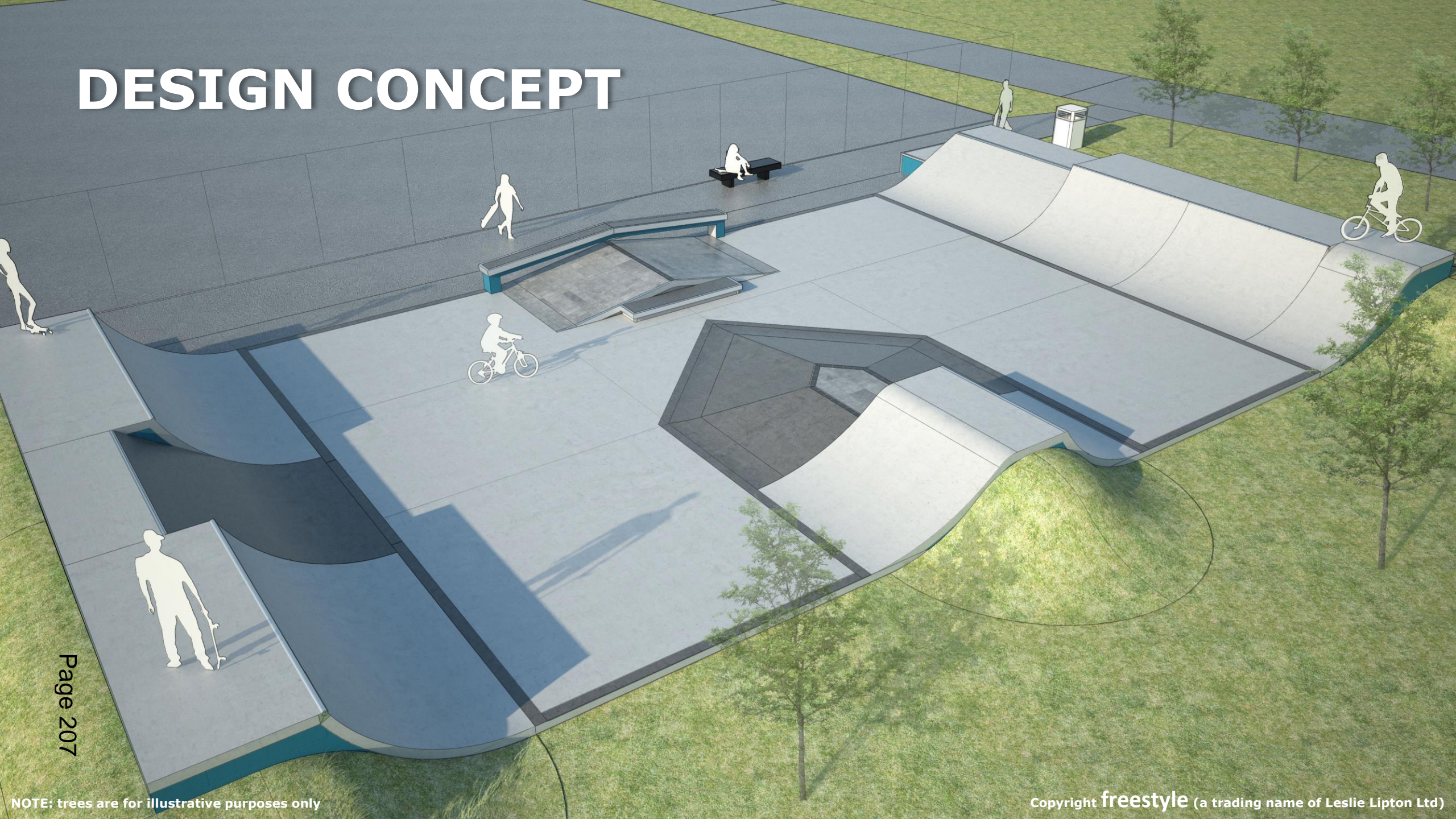
**7. Local Government (Access to Information) Act 1985:  
List of Background Papers**

7.1 Cabinet report dated 18 July 2018 entitled Mercer Park Skate Boarding Facility

**8. Freedom of Information**

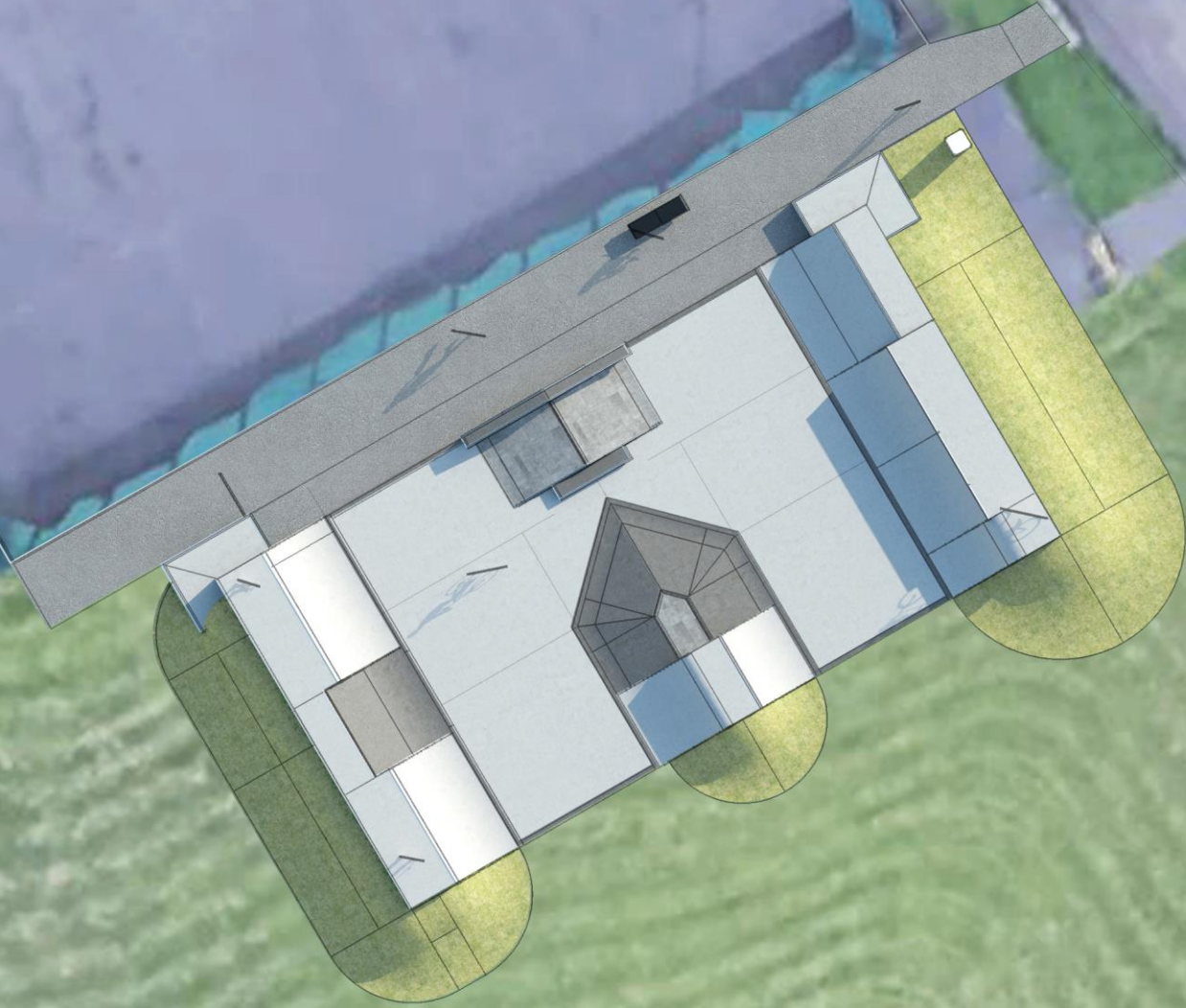
8.1 The report does not contain exempt information under the Local Government Act 1972, Schedule 12A and all information can be disclosed under the Freedom of Information Act 2000.

# DESIGN CONCEPT





# DESIGN IN-SITU



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**Hyndburn Borough Council**  
**Customer First Analysis**

**What is it for?**

Our corporate values include putting the customer first, providing opportunities for bright futures and narrowing inequality across the Borough.

From 1 April 2011, a new legal duty applies to all public authorities. It covers these protected characteristics:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- gender;
- sexual orientation; and, for some aspects,
- marriage and civil partnerships.

The duty means that – as previously - we should analyse the effect of existing and new policies and practices on equality. It does not specify how we should do this. However, legal cases on the meaning of the previous general equality duties make it clear that we must carry out the analysis **before making the relevant policy decision**, and include consideration as to whether we can reduce any detrimental impact.

The framework overleaf – our Customer First Analysis - is suggested when making a written record of the analysis. This replaces Equality Impact Assessments.

The Analysis should be **proportionate** to the policy decision being taken. In some cases the written record will be a quick set of bullet points or notes under each heading, to deal with any questions which are relevant (or briefly explain why if they aren't). Others will need to be much more detailed. A meaningful Analysis will help the Council make the best decision or formulate a policy which best meets our customers' needs.

Please return completed Customer First Analyses to Human Resources. I can guide you through the process if this would be helpful.

If you have any suggestions for improving this process, please let me know.

Kirsten Burnett  
Head of HR

## Customer First Analysis

### 1. Purpose

- What are you trying to achieve with the policy / service / function?  
To refurbish and improve the skate boarding facility at Mercer Park
- Who defines and manages it?  
Hyndburn BC manages the site in liaison with the local community via FO Mercer Park
- Who do you intend to benefit from it and how?  
All young people in Hyndburn who enjoy wheeled sports
- What could prevent people from getting the most out of the policy / service / function?  
If the local community cannot access Mercer Park
- How will you get your customers involved in the analysis and how will you tell people about it?  
The proposed new skate boarding facility was designed in consultation with local young people

### 2. Evidence

- How will you know if the policy delivers its intended outcome / benefits?  
If the new wheeled sports facility is well used by local young people
- How satisfied are your customers and how do you know?  
The local community via FO Mercer Park has made the Council aware that the old facility was in need of refurbishment and improvement
- What existing data do you have on the people that use the service and the wider population?  
Users were consulted directly about the proposed new design
- What other information would it be useful to have? How could you get this?  
Information about people who use the facility via FO Mercer Park and local councillors
- Are you breaking down data by equality groups where relevant (such as by gender, age, disability, ethnicity, sexual orientation, marital status, religion and belief, pregnancy and maternity)? Not at this stage
- Are you using partners, stakeholders, and councillors to get information and feedback?  
The Council is working with Proffitts CIC to deliver this project

### 3. Impact

- Are some people benefiting more – or less - than others? If so, why might this be?  
Those who currently use the facility will benefit more than those who don't

### 4. Actions

- If the evidence suggests that the policy / service / function benefits a particular group – or disadvantages another - is there a justifiable reason for this and if so, what is it?  
The facility has free and open access to all members of the community
- Is it discriminatory in any way?  
There is no evidence of this
- Is there a possible impact in relationships or perceptions between different parts of the community?  
The Hyndburn Green Spaces Forum is the overarching group in the Borough with an interest in green space and they support this project
- What measures can you put in place to reduce disadvantages?  
Continue to have free and open access to this facility
- Do you need to consult further?

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Any further consultation about the skate facility will be undertaken in partnership with FO Mercer Park and Proffittss CIC

- Have you identified any potential improvements to customer service?  
This new skate facility will allow more people to use the park and has better play value
- Who should you tell about the outcomes of this analysis?  
Cabinet
- Have you built the actions into your Business Plan with a clear timescale?  
There is a project plan for the delivery of this new facility
- When will this assessment need to be repeated?

**Name: Craig Haraben**

**Signed:**



**Service Area: Environmental Services**

**Dated: 2 August 2019**

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# Agenda Item 9.

REPORT TO:	Cabinet		
DATE:	12 September 2019		
PORTFOLIO:	Cllr Miles Parkinson, Leader		
REPORT AUTHOR:	Joe McIntyre, Deputy Chief Executive		
TITLE OF REPORT:	Council Tax Support Consultation		
EXEMPT REPORT (Local Government Act 1972, Schedule 12A)	Options	Not applicable	
KEY DECISION:	<b>No</b>	If yes, date of publication:	

## 1. **Purpose of Report**

- 1.1 This purpose of this report is to seek approval to commence a public consultation on plans to revise Hyndburn Council's Council Tax Support Scheme for 2020/21.

## 2. **Recommendations**

- 2.1 This report requests that Cabinet:
- 2.2 Authorises the Deputy Chief Executive to commence a public consultation on plans to revise the current Council Tax Support Scheme from April 2020.
- 2.3 Notes that the consultation will run for 12 weeks the 13<sup>th</sup> September 2019 to 5<sup>th</sup> December 2019 and will guide the final recommendations to be placed before Full Council for approval of the Council Tax Support Scheme by 31<sup>st</sup> January 2020.

## 3. **Reasons for Recommendations and Background**

- 3.1 In 2020/2021, Council Tax Support (CTS) will be in its seventh year, having been devolved to Local Authorities nationally in 2013 following the abolition of Council Tax Benefit. In 2013 Local Authorities were given a broad remit to design their own local CTS schemes for working age claimants, with pension age claimants still subject to a national scheme allowing up to 100% CTS.
- 3.2 Prior to 2013 Council Tax Benefit was funded in full by the Government: when Council Tax Support was introduced, the Government reduced Hyndburn's grant by 10% of the previous year's expenditure for all claimants and rolled future funding into the Revenue Support Grant.
- 3.3 Along with the majority of other Local Authorities, we introduced a minimum payment level for working age CTS claimants in 2013/14. The scheme also included four other changes designed to make the scheme fairer and to provide streamlined administration. The Hyndburn scheme otherwise mirrored the old Council Tax Benefit scheme.

- 3.4 Subsequent changes to our CTS schemes have included provisions to mirror national changes to Housing Benefit and Universal Credit and minimum payment level increases from 20% to 27% in 2016/17 and to 30% from 2017/18. Our scheme has been reviewed annually to ensure that it remains sustainable and the minimum payment levels remain at 30% today.
- 3.5 Council Tax Support cannot be considered in isolation: any changes to the scheme must be viewed in the context of national changes to benefits, (Universal Credit in particular), overall Council Tax increases (which increase CTS expenditure) and the end of the Revenue Support Grant from 2020/21. In light of uncertainty around the Local Government Spending Review and the UK's exit from the European Union, it is considered prudent at this point to review our CTS scheme and to conduct a public consultation on potential changes.

### **Council Tax Increases**

- 3.6 Since 2013, Hyndburn Borough Council has increased its Council Tax precept by 6.5% overall with no increases in the four years from 2013/14 and 2016/17.
- 3.7 During the same period, as a result of other preceptor increases, Council Tax bills have increased in Hyndburn by 21%, adding £329.82 to Band D Council Tax between 2013 and 2019 (Appendix 4). The largest of these increases are from Lancashire County Council through the addition of the Adult Social Care precept and Lancashire Police, the precept for which increased 13.5% in 2019/20.
- 3.8 Having a minimum payment level for Council Tax Support means that CTS expenditure increases alongside overall Council Tax increases.
- 3.9 From 2017/18 to 2019/20, the CTS minimum payment level has remained steady at 30%. However over these three financial years, CTS expenditure has increased due to overall rises in Council Tax of 10%. This increase has raised CTS expenditure by £92,897, Hyndburn's proportion of which was £12,541. Any future increases in Council Tax levels will increase CTS expenditure unless the scheme is adjusted.

### **Universal Credit**

- 3.10 When considering CTS in the context of national benefits, Universal Credit (UC) is having the greatest impact. There are three main reasons for this:
1. The calculation of UC is fundamentally different to previous benefits as it is linked to real time earnings information from HMRC and if there is a change to income, then a claim may be assessed every month.
  2. Any change to UC entitlement directly affects CTS entitlement.
  3. As a localised scheme, our current CTS scheme does not align completely with the national prescribed CTS scheme which has adjusted in line with the national UC scheme. The differences between the prescribed scheme and

our scheme prevent automation, creating an increased administrative burden for the Council.

- 3.11 In April 2018 there were 432 CTS claims from UC claimants. By March 2019 this had risen to 1,141, an increase of 709 (164%). This figure is increasing all the time and once the national roll out of UC is completed, we are likely to have around 5,000 working age claimants on UC.
- 3.12 Each change to a UC claim generates a 'notice' from the DWP to our benefits team. Notices issued by the DWP for UC claims rose from 6,189 in 2017/18 to 24,683 in 2018/19, an increase of 18,494 (300%). As claims increase, so will the number of notices issued by the DWP. Based on an estimated 5,000 claims this could be 100,000 notices annually.

### **Revenue Support Grant and Council Funding**

- 3.13 Prior to 2013, Council Tax Benefit was funded in full by the Government. From 2013, CTS was initially funded by a cash limited grant from Central Government at 90% of the previous year's expenditure. The Government maintained funding levels for the first two years of operation and this allowed us to keep the minimum payment level at 20% during 2013/14 and 2014/15. We were also able to maintain the same support rate through the third year of operation in 2015/16 despite a reduction in Revenue Support Grant in 2015/16 of 33%.
- 3.14 Further Revenue Support Grant reductions and service demands have meant that alongside efficiency measures made throughout services for both Hyndburn and its preceptors, the cost of providing the working age CTS scheme has meant that in order to remain available to as many claimants as needed, the minimum payment levels have had to be increased and currently lie at 30%.
- 3.15 Local Government funding is currently facing change and uncertainty on multiple fronts: the pending Local Government Spending Review, the UK's exit from the European Union and the end of the Revenue Support Grant have all contributed to the decision to review the CTS scheme, its affordability and its relevance to our changing claimant base.

### **Consultation Proposal**

- 3.16 This report seeks approval for a public consultation on the current working age CTS scheme for Hyndburn. The changes under review include the funding of the scheme and its impact on the minimum payment level as well as the administration of the scheme in light of the implementation of Universal Credit. A draft scheme is attached at Appendix 1.

3.17 It is proposed that the consultation offers three main funding options to residents with the added facility to suggest any alternatives that they would like to have considered.

**Funding Option 1: Increase the minimum payment level**

3.18 The consultation will ask for views on raising the minimum payment level above the current 30% with three increases being suggested: 35%, 37.5% and 40%.

3.19 Any change to minimum payment levels would impact all working age claimants of Council Tax Support (currently around 4,300 households) and based on 2019/20 Council Tax levels for a Band A property, would have the following impact:

<b>Full Council Tax bill with two or more adults: £1,242.03</b>			
Minimum payment level	Annual Bill	Annual Increase	Weekly Increase
30%	£372.61	-	-
35%	£434.71	£62.10	£1.19
37.5%	£465.76	£93.15	£1.79
40%	£496.81	£124.20	£2.39

3.20 For households with only one adult resident, the same minimum level increases would have the following impact:

<b>Full Council Tax bill with 25% reduction: £931.52</b>			
Minimum payment level	Annual Bill	Annual Increase	Weekly Increase
30%	£279.45	-	-
35%	£326.03	£46.58	£0.90
37.5%	£349.70	£70.25	£1.35
40%	£372.60	£93.15	£1.79

3.21 Raising the minimum payment level would increase the collectible debit for all Council Tax preceptors. Again using 2019/20 Council Tax figures, the potential increases to income are broken down by preceptor:

% Increase	LCC 72.3%	HBC 13.2%	Police 10.8%	Fire 3.7%	Total
35%	£102,501	£18,714	£15,311	£5,246	£141,772
37.5%	£153,753	£28,071	£22,967	£7,868	£212,659
40%	£205,003	£37,428	£30,623	£10,491	£283,545

3.22 It is important to note that while the net collectible debit will increase, projected additional income for all preceptors is adjusted downwards by 10-20% based on the lower collection rate levels from households in receipt of CTS.

## **Funding Option 2: Increase Council Tax levels for all taxpayers**

- 3.23 Hyndburn Council can raise its proportion of Council Tax by up to 3% without holding a public referendum<sup>1</sup>. While it is difficult to predict both Council Tax increases and CTS expenditure, we are able to use recent trends to model for future financial years.
- 3.24 Over the last three financial years, Council Tax overall has increased on average by 4.5% a year.
- 3.25 If Council Tax increases by 4.5% in 2020/21, CTS expenditure for all claimants will increase by £252,558 from £5,612,412 to £5,864,970. Hyndburn's proportion of this shortfall would be £34,095.
- 3.26 To fund a CTS shortfall of £34,095, Hyndburn Council would have to raise its precept by 0.6%. Other preceptors will also need to accommodate their proportion of the shortfall with a 0.6% increase in Council Tax if they choose to fund their proportion of the shortfall in this way.

## **Funding Option 3: Making savings by cutting or reducing other services**

- 3.27 Savings made would have to be equivalent to a shortfall in CTS funding, which as above, will be an estimated £34,095.

## **Scheme Administration Changes**

- 3.28 3.10 – 3.12 of this report highlights some of the impact that Universal Credit is having on CTS.
- 3.29 The current CTS scheme does not align completely with the national prescribed CTS scheme or UC scheme and their differences prevent automation, creating an increased administrative burden for the Council. The consultation will request views on an option to standardise our scheme in Hyndburn with the national UC and prescribed CTS schemes and remove the differences left over from the calculation of Council Tax Benefit and Housing Benefit.
- 3.30 If this change was implemented, we would be removing local income disregards; extra amounts that the current scheme allows claimants to earn before it affects their CTS. These income disregards have been abolished in the calculation of UC and the prescribed CTS scheme and as a result, CTS claims that still have these disregards require manual intervention to assess them.
- 3.31 By March 2019, the UC/CTS case load was 1,141. Of this number, around 300 claims generated over 40% of the changes as a result of the local income disregards and these changes had to be processed manually.

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<sup>1</sup> This is subject to change as the Secretary of State announces an annual level each year. 3% was the 19/20 referendum level applicable to Hyndburn Borough Council

- 3.32 Once the national migration to UC is rolled out, the administrative burden of manual changes will have a wider impact on the service. We estimate that with a full roll out of UC, the Council will receive just short of 100,000 changes annually, of which 40,000 will have to be processed manually.
- 3.33 Making this change to the CTS scheme would provide £30k of savings across all preceptors, HBC's share being £4k. This figure is based on the current caseload of UC/CTS claims and will increase as claims increase.
- 3.34 Although these changes would reduce CTS expenditure, the main driver behind this proposal is the potential to prevent an increase in administration costs. FTE in the benefits team has reduced gradually over the last five years in anticipation of both UC and advances in automation. Having a significant increase in manual processing would necessitate more resources at an estimated cost of £70k/year for two members of staff, a cost not shared by our preceptors.

### **Impact of CTS Scheme Changes and Wider Considerations**

- 3.35 When preparing to consult on any change to our CTS scheme, we have accessed research done on a national level on Council Tax Support, in particular the schemes in place and the impact studies that have been produced since 2013. A recent study by the Institute for Fiscal Studies highlights that in 2018/19 the most common level of minimum payment is 20% - adopted by almost a quarter of English Councils. A fifth of Councils have maintained CTS at pre-2013 levels with no minimum payment level and another fifth have minimum payment levels above 20%, the highest being 50%.
- 3.36 In 2018/19 (the most recent figures available to us), Hyndburn's minimum payment level, having remained static for three years was joint 6th highest nationally along with 18 other authorities with a minimum payment level of 30%.
- 3.37 More locally, the most common minimum payment level in Lancashire is 20% and other schemes range from 0% (Lancaster and South Ribble) to 27.1% (Blackpool).

<b>Lancashire Authority</b>	<b>Minimum payment level</b>
<b>Hyndburn</b>	30.0%
<b>Blackpool</b>	27.1%
<b>Fylde</b>	22.7%
<b>West Lancs</b>	22.0%
<b>Pendle</b>	20.0%
<b>Preston</b>	20.0%
<b>Rosendale</b>	20.0%
<b>Blackburn with Darwen</b>	20.0%
<b>Burnley</b>	17.5%

<b>Ribble Valley</b>	12.0%
<b>Wyre</b>	8.50%
<b>Chorley</b>	7.50%
<b>Lancaster</b>	0.00%
<b>South Ribble</b>	0.00%

3.38 To date, a handful of other Councils have begun a consultation on funding options for 2020/21 but too few to determine whether or not our funding options are broadly similar. Based on the trend towards higher minimum payment levels since the introduction of CTS however, we anticipate that more authorities will look to increase minimum payment levels as alternative funding options become harder to find.

3.39 There are currently around 7,200 households claiming Council Tax Support in Hyndburn; 2,900 (40%) are pensioners and 4,300 (60%) are working age. Pensioners are protected under Government legislation and continue to receive Council Tax Support to the same level as they did under the Council Tax Benefit rules, up to a maximum of 100%.

#### 4. **Alternative Options considered and Reasons for Rejection**

4.1 The Council could choose not to consult on the Council Tax Support scheme and as such no changes could be made in 2020/21. This would not allow us to consider the views of the local population or interested parties and this would limit our options to fund the Council Tax Support scheme for 2020/21 to either cutting services or raising Council Tax levels.

4.2 This reports requests only that a consultation is conducted at this stage, any eventual changes to the CTS scheme will be considered in light of responses received. The option to continue with the current scheme remains after consultation.

#### 5. **Consultations**

5.1 The Local Government Finance Act 2012 provides that the Council, as the billing authority, must consider whether to revise its Council Tax Support Scheme or replace it with another scheme by the 31<sup>st</sup> March every year. However due to constraints of the annual billing process and updating of welfare benefits and our systems, changes to CTS schemes must be agreed by the 31<sup>st</sup> January in that year.

5.2 Prior to revising or replacing their scheme the billing authority must, in accordance with Government legislation:

- consult with any major preceptors;
- publish a draft scheme in such a manner it thinks fit;
- consult with such other persons it considers may have an interest in the scheme.

5.3 Plans to revise the Council Tax Support scheme will affect all current working age claimants of which there are currently around 4,300 households. Pensioners will not be affected by any changes made to Hyndburn's Council Tax Support Scheme.

5.4 Our duty to consult extends to affected households and major preceptors as well as interested parties. This means our consultation will cover several areas, the main focus being:

- online consultation,
- email consultation,
- consultations by post.

5.5 The Council Tax Support Consultation Strategy is attached to this report at Appendix 2.

## 6. Implications

Financial implications (including any future financial commitments for the Council)	As detailed in the report, grant income from central government continues to reduce for awards of CTS and action is required to reduce overall expenditure to maintain a balanced budget. The consultation costs will be contained within existing budgets.
Legal and human rights implications	<p>The legislative and consultation requirements are set out in section 5 of this report.</p> <p>A comprehensive legal review of any scheme and all associated policies will be conducted prior to final publication if the scheme is altered.</p> <p>The Council aims to operate a CTS scheme that is fair, legal and resilient to challenge.</p>
Assessment of risk	<p>A risk assessment has been carried out and identified the following:</p> <p><b>Timescales:</b> the consultation has a limited period in which it must be conducted in order that any recommendations and decisions can be made by the 31 January 2020.</p> <p><b>Insufficient Responses received,</b> the Council has previous experience of</p>

	<p>consulting on this issue and will use a variety of means to gauge public opinion however there is always the possibility that the issue does not engage with the public and we receive very few responses.</p>
<p>Equality and diversity implications A <a href="#">Customer First Analysis</a> should be completed in relation to policy decisions and should be attached as an appendix to the report.</p>	<p>The Council is subject to the public sector equality duty introduced by the Equality Act 2010. When making a decision in respect of the recommendations in this report, and in respect of a consultation and potential changes to CTS, Cabinet must have regard to the need to:</p> <ul style="list-style-type: none"> <li>• eliminate unlawful discrimination, harassment and victimisation; and</li> <li>• advance equality of opportunity between those who share a relevant protected characteristic and those who don't; and</li> <li>• foster good relations between those who share a relevant protected characteristic and those who don't.</li> </ul> <p>For these purposes the relevant protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. To assist the Cabinet in this regard a Customer First Analysis has been carried out as part of the review process and is attached to this report at Appendix 3. Cabinet is advised to consider the Customer First Analysis and its obligations in respect of the public sector equality duty when making a decision in respect of the recommendations contained in this report.</p>

7. Local Government (Access to Information) Act 1985:  
List of Background Papers

7.1 Copies of documents included in this list must be open to inspection and, in the case of reports to Cabinet, must be published on the website.

1. [Council Tax Support Scheme Council Report 5<sup>th</sup> January 2017](#)
2. [Council Tax Support Scheme 2019/20](#)

8. Freedom of Information

- 8.1 The report does not contain exempt information under the Local Government Act 1972, Schedule 12A and all information can be disclosed under the Freedom of Information Act 2000.



**HYNDBURN**  
The place to be  
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# Council Tax Support

## Proposed Scheme 2020/21

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August 2019

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## 1. Introduction

- 1.1 Council Tax Benefit was abolished on 31 March 2013 and Local Authorities in England were given a 31 January 2013 deadline to introduce a Local Council Tax Support (LCTS) scheme to be implemented on 1 April 2013. Hyndburn's current Council Tax Support scheme has been in operation since 1 April 2017 and is available to view on our [Council Tax Support webpages](#).
- 1.2 The Local Government Finance Act 2012 and the Welfare Reform Act 2012 included provision for Local Authorities to make changes to their LCTS schemes providing that they conduct a public consultation exercise on funding options and publish a final scheme by 31 March in any given year.
- 1.3 Hyndburn Borough Council has revised its scheme three times since 2013. These revisions have been in response to reductions in funding for the scheme and national welfare benefit changes.
- 1.4 As of August 2019, there are approximately 7,200 households claiming Council Tax Support in Hyndburn; 2,900 (40%) are pensioners and 4,300 (60%) are working age. Pensioners are protected under Government legislation and continue to receive Council Tax Support to the same level as they did under the Council Tax Benefit rules.
- 1.5 Working age claimants are currently being asked to pay a minimum of 30% towards their Council Tax which for a current Band A property is £372.61 for a full bill and £279.46 with a single occupancy discount. Information held confirms that 75% of Taxpayers in this category are paying their Council Tax on time.
- 1.6 Continued funding reductions, changes to national state benefits such as Universal Credit and the end of the Revenue Support Grant from 2020 has prompted a review of the current Council Tax Support scheme, a proposal for which is covered in this document.
- 1.7 This document sets out the Council's proposals to revise its Council Tax Support Scheme by reducing the minimum payment level for all working age recipients from between 5% and 10% and to revise administration of current assessment criteria to mirror the prescribed CTS scheme and Universal Credit regulations.
- 1.8 This document has been produced prior to a public consultation exercise which will guide the Council's decisions on a final scheme for implementation in April 2020.
- 1.9 Alternative options for funding the Council Tax Support scheme will be proposed as part of our consultation and will be considered again before any final scheme is published.

## 2. Proposed Scheme for 2020/21

- 2.1 The 2019/20 scheme sets out the rules for working age claimants. Eligibility for Council Tax Support will be calculated on a “means tested” basis and we will take account of the income and capital of the claimant and their partner (if applicable).
- 2.2 This proposed scheme is based on the current Council Tax Support scheme as defined by the terms of the existing regulations with the exception of the following:-

### Reduction in Council Tax Support

- 2.3 Council Tax Support currently allows for up to 70% of a working age claimant’s Council Tax to be paid as support. It is proposed that entitlement to Council Tax Support be reduced by either 5%, 7.5% or 10% for all working age claimants, which means that all claimants, whether in work or in receipt of a passported benefit (as defined overleaf) would have to make an increased contribution towards their Council Tax.
- 2.4 By ensuring that all working age CTS recipients pay a contribution towards their Council Tax, the scheme is equitable and does not disadvantage people who are already in work, which would undermine the principles of Universal Credit and welfare reform.
- 2.5 Reducing the level of CTS available to working age claimants would raise the minimum Council Tax payable. Illustrative figures are provided below and are based on Council Tax at 2019/20 levels for a Band A property.

Full Council Tax bill with two or more adults: £1,242.03			
Minimum Payment Level	Annual Bill	Annual Increase	Weekly Increase
30%	£372.61	-	-
35%	£434.71	£62.10	£1.19
37.5%	£465.76	£93.15	£1.79
40.0%	£496.81	£124.20	£2.39
Full Council Tax bill with a 25% reduction: £931.52			
30%	£279.45	-	-
35%	£326.03	£46.58	£0.90
37.5%	£349.70	£70.25	£1.35
40.0%	£372.60	£93.15	£1.79

## Scheme Administration Changes

- 2.6 When considering CTS in the context of national benefits, Universal Credit (UC) is having the greatest impact. There are three main reasons for this:
- The calculation of UC is fundamentally different to previous benefits as it is linked to real time earnings information from HMRC and if there is a change to income, then a claim may be assessed every month.
  - Any change to UC entitlement directly affects CTS entitlement.
  - As a localised scheme, our current CTS scheme does not align completely with the national prescribed CTS scheme which has adjusted in line with the national UC scheme. The differences between the prescribed scheme and our scheme prevent automation, creating an increased administrative burden for the Council.
- 2.7 In April 2018 there were 432 CTS claims from UC claimants. By March 2019 this had risen to 1,141, an increase of 709 (164%). This figure is increasing all the time and once the national roll out of UC is completed, we are likely to have around 5,000 working age claimants on UC.
- 2.8 Each change to a UC claim generates a 'notice' from the DWP to our benefits team. Notices issued by the DWP for UC claims has risen from 6,189 in 2017/18 to 24,683 in 2018/19, an increase of 18,494 (300%). As claims increase, so will the number of notices issued by the DWP. Based on an estimated 5,000 claims this could be 100,000 notices annually.
- 2.9 The current CTS scheme does not align completely with the national prescribed CTS scheme or UC scheme and their differences prevent automation, creating an increased administrative burden for the Council. The consultation will request views on an option to standardise our scheme in Hyndburn with the national UC and prescribed CTS schemes and remove the differences left over from the calculation of Council Tax Benefit and Housing Benefit.
- 2.10 If this change was implemented, we would be removing local income disregards; extra amounts that the current scheme allows claimants to earn before it affects their CTS. These income disregards have been abolished in the calculation of UC and the prescribed CTS scheme and as a result, CTS claims that still have these disregards require manual intervention to assess them.
- 2.11 By March 2019, the UC/CTS case load was 1,141. Of this number, around 300 claims generated over 40% of the changes as a result of the local income disregards and these changes had to be processed manually.
- 2.12 Once the national migration to UC is rolled out, the administrative burden of manual changes will have a wider impact on the service. We estimate that

with a full roll out of UC, the Council will receive just short of 100,000 changes annually, of which 40,000 will have to be processed manually.

- 2.13 Making this change to the CTS scheme would provide £30k of savings across all preceptors, HBC's share being £4k. This figure is based on the current caseload of UC/CTS claims and will increase as claims increase.
- 2.14 Although these changes would reduce CTS expenditure, the main driver behind this proposal is the potential to prevent an increase in administration costs. FTE in the benefits team has reduced gradually over the last five years in anticipation of both UC and advances in automation. Having a significant increase in manual processing would necessitate more resources at an estimated cost of £70k/year for two members of staff, a cost not shared by our preceptors.

### **3. Consultation**

- 3.1 The Local Government Finance Act 2012 sets out that billing authorities must:
- consult any major precepting authority, and then;
  - publish a draft scheme, and then;
  - consult those people who have an interest in how the new scheme will operate.
- 3.2 Consulting with all interested parties will ensure that we better understand the impact of these proposals on individuals and certain groups. We will consider the feedback we receive together with all suggestions before we decide upon a final scheme.
- 3.2 A consultation strategy has been produced and is available on request or to download at [www.hyndburnbc.gov.uk/counciltaxsupport](http://www.hyndburnbc.gov.uk/counciltaxsupport)

### **4. Legislation**

- 4.1 The Local Government Finance Act 2012 and the Welfare Reform Act 2012 included provision for Local Authorities to make changes to their CTS schemes providing that they conduct a public consultation exercise on the changes and publish a final scheme by 31 March in any given year.

### **5. Pensioners**

- 5.1 The Government is committed to protecting pensioners on low incomes and as such pensioners are not affected by these proposed changes. In accordance with current legislation, a pensioner becomes eligible for pensioner-related Council Tax Support at the age at which they can qualify for State Pension Credit. From April 2020, the qualifying age will be 65 rising to 66 by the end of the financial year.

## **6. Vulnerable People**

6.1 The Government issued guidance to protect pensioners from increased Council Tax costs but did not prescribe any further action in relation to vulnerable groups. Decisions on how to support these groups were left to local discretion. Hyndburn Council has regard to the following legislation in designing and updating its scheme.

- The Equality Act 2010 – the public sector Equality Duty in respect of protected characteristics.
- The Child Poverty Act 2010 – duty to reduce and mitigate the effect of child poverty in local areas.
- The Housing Act 1996 – duty to prevent homelessness

## **7. Fair and Equitable Council Tax Support Scheme**

7.1 Hyndburn Council's Council Tax Support Scheme is fair and equitable for all claimants.

7.2 The personal allowances and applicable amounts currently used to calculate Council Tax Support are the amounts deemed necessary to provide for basic needs based on household composition and disability. These allowances and applicable amounts already take the claimant's circumstances into account and mean that they are awarded more benefit if their circumstances require it.

7.3 The figures used to calculate Council Tax Support are adjusted annually so that applicable amounts and personal allowances are the same as those used to assess Housing Benefit or Universal Credit.

7.4 Hyndburn's Council Tax Support Scheme reflects the Government's intention to bring all benefits in-line with the Consumer Price Index and any annual uprating will be in line with Consumer Price Index or any other pricing structure used to uprate Housing Benefit or Universal Credit.

7.5 Any annual changes to figures used will take effect from 1 April each year.

## **8. Class of Persons**

8.1 The Government, through regulations, prescribes certain classes of persons who are not eligible to claim Council Tax Support.

## **9. Working Age**

9.1 Working age claimants are defined as a class of persons who have not reached the qualifying age for State Pension Credit, which from April 2020 will be 65 rising to 66 by the end of the financial year.

## **10. Applications for Council Tax Support**

10.1 Our standard application form should be completed in respect of all new claims for Council Tax Support. If this proposed scheme is adopted, CTS claims in payment on 31 March 2020 will be automatically adjusted on 1 April 2020; claimants will not have to reapply.

## **11. Notifications of Awards**

- 11.1 Upon receipt of all relevant information, Hyndburn Council will make a decision on a claim within a reasonable timescale.
- 11.2 Notification of awards will be issued to customers with a detailed breakdown of the calculation used when assessing their Council Tax Support. The decision letter will include information relating to the review and appeals process.

## **12. Changes to Entitlement**

- 12.1 In addition to the review process, all claimants will have a duty to notify Hyndburn Council of changes in their personal or household circumstances. This must be done in writing and within one calendar month of the change occurring.

## **13. Overpaid Council Tax Support**

- 13.1 All overpayments of Council Tax Support will be recoverable with the exception of circumstances where the Council believes it would be unreasonable to expect the customer to know they had been overpaid.
- 13.2 A revised Council Tax demand will be issued and any amount of overpaid Council Tax Support which is to be recovered will be included in an adjusted Council Tax bill.

## **14. Appeals Process**

- 14.1 A formal appeals process has been adopted by Hyndburn Council. Claimants are notified as part of the notification processes how they may appeal a decision and what decisions are appealable.

## **15. Hardship Scheme**

- 15.1 As prescribed within the Local Government Finance Act 2012, the Council has an established Council Tax Support Hardship Scheme to which claimants can apply in circumstances of exceptional hardship.

## **16. Fraud**

- 16.1 The Council will investigate cases where it has reason to believe that an amount of Council Tax Support has been awarded as a result of a fraudulent act by the customer or a person acting on their behalf. This will include situations where the customer fails to notify Hyndburn Council of any changes in household composition, income or capital that results in an overpayment of Council Tax Support.

## **17. Annual Council Tax Support Scheme Review**

- 17.1 The Council Tax Support Scheme is reviewed annually and may be subject to change. The Council will undertake a review of the scheme each year to ensure that the scheme remains fair and equitable as well as affordable.

## **18. Data protection**

- 18.1 Council Tax Support scheme administration and the proposed scheme pays due regard to The Data Protection Act 2018 and the General Data Protection Regulations 2018. [Details of our privacy notice can be found on our website.](#)

## **19. Equalities**

- 19.1 An equality Impact Assessment in the form of a Customer First Analysis has been produced for this proposed scheme and consultation and is available on our Council Tax Support pages.



# Council Tax Support Consultation Strategy 2020/21

August 2019

## 1. Introduction

- 1.1 Council Tax Support replaced Council Tax Benefit on 1 April 2013 and forms part of the Government's continuing wider reforms of the welfare system.
- 1.2 The Local Government Finance Act 2012 and the Welfare Reform Act 2012 gave Local Authorities in England until the 31 January 2013 to introduce a Local Council Tax Support (LCTS) scheme to be implemented on 1 April 2013. Local Authorities were compelled before this deadline to conduct a public consultation exercise on their proposed schemes.
- 1.3 The same legislation, as amended, also included provision for Local Authorities to make changes to their LCTS schemes annually providing that they conduct a public consultation exercise on any proposals and publish a final scheme by 31 March in any given year.
- 1.4 This document sets out Hyndburn Borough Council's Council Tax Support Consultation Strategy for 2020/21.

## 2. Consultation 2020/21

- 2.1 The Local Government Finance Act 2012 sets out that billing authorities must:
  - consult any major precepting authority, and then;
  - publish a draft scheme, and then;
  - consult those people who have an interest in how the new scheme will operate.
- 2.2 Consulting with interested parties will ensure that we better understand the impact of any proposals on individuals and certain groups. We will consider the feedback we receive together with all suggestions for improving the draft scheme before we decide upon any final scheme for 2020/21.

- 2.3 We will conduct a fair, balanced and open consultation which will provide as many people as possible with the opportunity to respond to proposals for Hyndburn's Council Tax Support Scheme.
- 2.4 This consultation aims to meet our statutory obligations under the Equality Act 2010 and we will take steps to meet the differing needs of people with protected characteristics. Details on how we will take protected characteristics into account during this consultation are outlined on page 3.

### **3. Method**

- 3.1 We recognise that the rate of subsidy in Council Tax Support is not just an issue for those in receipt of these subsidies, but impacts on all local residents as they are contributing to the subsidiary via the taxes they pay. Our consultation will therefore include tax payers as well as those in receipt of the benefit and other interested parties including the main preceptors.
- 3.2 Consultation will be multi-faceted and will vary in its methods so that we provide a range of opportunities to allow as many people as possible to have their say.
- 3.3 Our methods for consultation will include:
- Online consultation
  - Postal surveys to current Council Tax Support claimants
  - Postal surveys to a selection of Council Tax taxpayers not in receipt of CTS
  - A web link on all emails sent to customers during the consultation period
  - Email surveys to recipients of Council Tax Support and taxpayers not in receipt of CTS
  - Telephone surveys for those unable to access the web or portal form
  - Survey response boxes in our main offices
- 3.4 We will advertise our consultation using:
- press releases to local newspapers,
  - our website,
  - leaflets sent out with other Council correspondence,
  - our telephone queue messages,
  - social media,
  - email

## 4. Equality Target Groups

4.1 The consultation and advertising methods in this strategy are wide ranging and we aim to consult with as many people as possible while giving different groups the opportunity to respond.

4.2 The methods available to us will be used to consult with:

- Current Council Tax Support claimants
- Current Council Tax payers
- Working age people
- Pension age people
- Groups who support people with financial advice
- Local Charities, Women’s Groups, local Churches and Mosques

This list is not exhaustive.

4.3 We recognise that this consultation will not be fully effective unless it takes into account the different marketing tools and consultation methods which have the most impact on people in certain groups – failure to do so can contribute to greater inequality and a poorer outcome. Some groups can be harder to reach than others and the table below illustrates some of the methods we will use with the aim of reaching a specific group.

Target Group	Consultation Methods to suit group	Advertising Methods to suit group
Age – working age from 18-65	<ul style="list-style-type: none"> <li>• Postal</li> <li>• Online</li> <li>• Email</li> <li>• Telephone</li> <li>• Face to face</li> </ul>	<ul style="list-style-type: none"> <li>• Online</li> <li>• Social media</li> <li>• Telephone messages</li> <li>• Post</li> </ul>
Age – older people 65+	<ul style="list-style-type: none"> <li>• Post</li> <li>• Online</li> <li>• Telephone</li> <li>• Face to face</li> <li>• Large print available</li> </ul>	<ul style="list-style-type: none"> <li>• Telephone messages</li> <li>• Post</li> <li>• Social media</li> </ul>
People with a disability	<ul style="list-style-type: none"> <li>• Online</li> <li>• Telephone</li> <li>• Face to Face</li> <li>• Large Print Available on request</li> <li>• Web-reader available</li> <li>• Appointments available for help with responses</li> </ul>	<ul style="list-style-type: none"> <li>• Online</li> <li>• Social media</li> <li>• Telephone messages</li> <li>• Post</li> </ul>
Black and Minority Ethnic groups	<ul style="list-style-type: none"> <li>• Postal</li> <li>• Online</li> <li>• Email</li> <li>• Telephone (including some other languages via</li> </ul>	<ul style="list-style-type: none"> <li>• Mosques</li> <li>• Community Centres</li> <li>• Online</li> <li>• Social media</li> <li>• Telephone messages</li> </ul>

## Appendix 2

	translation services) • Face to face	• Post
<b>Homeless people or those under threat of homelessness</b>	• Face to Face • Housing advice appointments	• Housing Advice team to promote the consultation • Community Groups and local charities

### 5. Length of Consultation

5.1 This consultation will run for 12 weeks from 13<sup>th</sup> September to 5<sup>th</sup> December 2019.

### 6. Responses

6.1 We will publish our responses on our website and in documentation produced when our scheme is finalised and published.

6.2 Responses received will be considered when finalising a new scheme, if one is to be implemented.

### 7. Public Sector Equality Duty and Privacy Statement

7.1 The survey will include an optional section to gather equalities monitoring data. This data will be used to ensure that our consultation has reached as many different people as possible as well as to analyse results.

7.2 Hyndburn Borough Council is committed to providing services which are fair and accessible for all. This consultation has considered the public sector equality duty throughout the project and a comprehensive Customer First Analysis has been completed and is available at [www.hyndburnbc.gov.uk/counciltaxsupport](http://www.hyndburnbc.gov.uk/counciltaxsupport) or by request.

7.3 All responses will be anonymous and no personal data that could be used to identify an individual will be gathered as part of this consultation.



# Council Tax Support

## Customer First Analysis 2020/21

August 2019

The Council's response to the public sector equality duty is a comprehensive Customer First Analysis.

#### 4. Purpose

- **What are you trying to achieve with the policy / service / function?**

The Council wishes to consult on options for changes to its Council Tax Support Scheme for 2020/21.

- **Who defines and manages it?**

The Welfare Reform Act 2012 and Local Government Finance Act 2012 provide the scope for Local Council Tax Support Schemes.

The consultation will be designed and implemented by Benefits, Revenues and Customer Contact management team.

- **Who do you intend to benefit from it and how?**

This is a consultation only at this stage. Decision makers will benefit by being informed on public opinion and residents will benefit from having the opportunity to provide their views on options.

- **What could prevent people from getting the most out of the scheme?**

Accessibility could be a barrier to being able to participate in the consultation; however the consultation strategy has considered accessibility and all information provided will be available in several formats.

- **How will you get your customers involved in the analysis and how will you tell people about it?**

Consultation on options for a revised Council Tax Support Scheme will take place between 13<sup>th</sup> September and 5<sup>th</sup> December 2019. The consultation will be made available to as many people as possible using a variety of methods such as web forms, postal surveys and telephone surveys. A consultation strategy has been written which covers this in more detail.

The Council Tax Support project has dedicated web pages on the Council's website: [www.hyndburnbc.gov.uk/counciltaxsupport](http://www.hyndburnbc.gov.uk/counciltaxsupport)

## 5. Evidence

- **How will you know if the policy delivers its intended outcome / benefits?**

The consultation aims to gather responses to enable a meaningful consideration of public opinion to be taken into account if changes are to be made to the 2020/21 Council Tax Support Scheme.

- **How satisfied are your customers and how do you know?**

The proposed consultation will address this.

- **What existing data do you have on the people that use the service and the wider population?**

Data we will use for this consultation includes names and addresses of liable Council Tax payers and current recipients of Council Tax Support.

We hold household and income details of current Council Tax Support recipients but this will not be used as part of the consultation. We have access to wider population statistics which will enable us to assess the range of responses we have received as equality monitoring data will be available (albeit optional) as part of the survey.

- **What other information would it be useful to have? How could you get this?**

It is not possible to future proof a Council Tax Support scheme, our claimant base changes on a daily basis and we cannot always foresee or predict major changes locally or nationally which is why a broad consultation is appropriate before narrowing down potential changes. We will be monitoring the consultations and schemes proposed by other local authorities in order to ensure that our scheme options are broadly consistent with national and local changes.

- **Are you breaking down data by equality groups where relevant (such as by gender, age, disability, ethnicity, sexual orientation, marital status, religion and belief, pregnancy and maternity)?**

Yes – equalities data will be collected throughout the consultation and will be used when analysing data.

## Appendix 3

- **Are you using partners, stakeholders, and councillors to get information and feedback?**

Yes – the consultation will be as inclusive as we can manage within our resources and we will consult with partners, groups and councillors.

### 6. **Impact**

- **Are some people benefiting more – or less - than others? If so, why might this be?**

No.

### 7. **Actions**

- **If the evidence suggests that the policy / service / function benefits a particular group – or disadvantages another - is there a justifiable reason for this and if so, what is it?**

This consultation is open to everyone.

- **Is it discriminatory in any way?**

No.

- **Is there a possible impact in relationships or perceptions between different parts of the community?**

No, the consultation is open to everyone in our community.

- **What measures can you put in place to reduce disadvantages?**

The consultation will be as accessible as we can make it in order to allow people to have their say.

- **Do you need to consult further?**

Not at this stage.

- **Have you identified any potential improvements to customer service?**

This will be the fourth Council Tax Support consultation since 2012 and we have learned from previous consultations how we can communicate with our residents with clarity and how we can gather enough responses to make the consultation meaningful.

We intend to build on our previous consultation successes to gather a wide range of public opinion.

- **Who should you tell about the outcomes of this analysis?**

## Appendix 3

This analysis will form part of the wider Council Tax Support project and will be included with all documents available to the public as part of our commitment to transparency.

- **Have you built the actions into your Business Plan with a clear timescale?**

Yes.

- **When will this assessment need to be repeated?**

If this project progresses to changes to the Council Tax Support scheme for 2020/21, this assessment will be repeated with any changes to the scheme taken into consideration.

<b>Council Tax Charges 2013/14 – 2019/20</b>					
	<b>HBC</b>	<b>LCC</b>	<b>Police</b>	<b>Fire</b>	<b>Total</b>
<b>2013/14</b>	Band D Charge £230.52	Band D Charge £1086.13	Band D Charge £152.92	Band D Charge £63.65	Band D Charge £1533.22
	Increase from Previous Year £0.00	Increase from Previous Year -£22.17	Increase from Previous Year £2.99	Increase from Previous Year £0.00	Increase from Previous Year -£10.82
	Percentage Increase 0%	Percentage Increase -2%	Percentage Increase 2%	Percentage Increase 0%	Percentage Increase -1%
<b>2014/15</b>	Band D Charge £230.52	Band D Charge £1107.74	Band D Charge £155.96	Band D Charge £63.65	Band D Charge £1557.87
	Increase from Previous Year £0.00	Increase from Previous Year £21.61	Increase from Previous Year £3.04	Increase from Previous Year £0.00	Increase from Previous Year £24.65
	Percentage Increase 0%	Percentage Increase 2%	Percentage Increase 2%	Percentage Increase 0%	Percentage Increase 1.6%
<b>2015/16</b>	Band D Charge £230.52	Band D Charge £1129.78	Band D Charge £159.06	Band D Charge £64.86	Band D Charge £1584.22
	Increase from Previous Year £0.00	Increase from Previous Year £22.04	Increase from Previous Year £3.10	Increase from Previous Year £1.21	Increase from Previous Year £26.35
	Percentage Increase 0%	Percentage Increase 2%	Percentage Increase 2%	Percentage Increase 2%	Percentage Increase 1.7%

## Appendix 4

	<b>HBC</b>	<b>LCC</b>	<b>Police</b>	<b>Fire</b>	<b>Total</b>
<b>2016/17</b>	Band D Charge £230.52	Band D Charge £1174.86	Band D Charge £162.22	Band D Charge £65.50	Band D Charge £1633.42
	Increase from Previous Year £0.00	Increase from Previous Year £45.08	Increase from Previous Year £3.16	Increase from Previous Year £0.64	Increase from Previous Year £49.21
	Percentage Increase 0%	Percentage Increase 2%	Percentage Increase 2%	Percentage Increase 1%	Percentage Increase 3.1%
<b>2017/18</b>	Band D Charge £235.52	Band D Charge (Inc Adult Social Care) £1221.74	Band D Charge £165.45	Band D Charge £65.50	Band D Charge £1688.21
	Increase from Previous Year £5.00	Increase from Previous Year £46.88	Increase from Previous Year £3.23	Increase from Previous Year £0.00	Increase from Previous Year £54.79
	Percentage Increase 2%	Percentage Increase 3.9%	Percentage Increase 2%	Percentage Increase 0%	Percentage Increase 3.3%
<b>2018/19</b>	Band D Charge £240.52	Band D Charge (Inc Adult Social Care) £1294.92	Band D Charge £177.45	Band D Charge £67.46	Band D Charge £1780.35
	Increase from Previous Year £5.00	Increase from Previous Year £73.18	Increase from Previous Year £12.00	Increase from Previous Year £1.96	Increase from Previous Year £92.14
	Percentage Increase 2%	Percentage Increase 3.9%	Percentage Increase 7.2%.	Percentage Increase 2.9%	Percentage Increase 5.5%
	<b>HBC</b>	<b>LCC</b>	<b>Police</b>	<b>Fire</b>	<b>Total</b>

Appendix 4

<b>2019/20</b>	Band D Charge £245.52	Band D Charge (Inc Adult Social Care) £1346.59	Band D Charge £201.45	Band D Charge £69.48	Band D Charge £1863.04
	Increase from Previous Year £5.00	Increase from Previous Year £51.67	Increase from Previous Year £24.00	Increase from Previous Year £2.02	Increase from Previous Year £82.69
	Percentage Increase 2%	Percentage Increase 3.9%	Percentage Increase 13.5%	Percentage Increase 2.9%	Percentage Increase 4.6
Overall Increase £	£15.00	£260.46	£51.52	£5.83	£329.82
Overall Increase %	6.5%	24%	32%	9%	21%

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<b>REPORT TO:</b>		Cabinet	
<b>DATE:</b>		12 September 2019	
<b>PORTFOLIO:</b>		Cllr Joyce Plummer - Resources	
<b>REPORT AUTHOR:</b>		Joe McIntyre Deputy Chief Executive	
<b>TITLE OF REPORT:</b>		Financial Position July 2019 Report for the Year Ending 31 <sup>st</sup> March 2020	
<b>EXEMPT REPORT (Local Government Act 1972, Schedule 12A)</b>	<b>No</b>	Not applicable	
<b>KEY DECISION:</b>	<b>No</b>	If yes, date of publication:	

## 1. Purpose of Report

- 1.1. The report informs Cabinet of the financial spending of the Council up to the end of July 2019 and the financial forecast outturn position for the Accounting Year 2019/20.

## 2. Recommendations

- 2.1. Cabinet notes the report and asks CMT to continue to reduce costs and increase income over the remaining months of the financial year.

## 3. Reasons for Recommendations and Background

### Summary

- 3.1. The financial detail of the report is shown as a table at the end of this document.
- 3.2. The spend for the first 4 months of the financial year to the end of July 2019 is £3,587,000 compared to a Budget of £3,651,000 giving a positive variance of £64,000 over the first 4 months of the year.
- 3.3. The current forecast spend to the end of the financial year in March 2020 is £10,960,000 compared to a Budget of £10,994,000. This forecast produces a

positive variance of £34,000 by the end of the financial year. There are small adverse forecasts on the outturn position for Planning & Transportation and Regeneration & Property Services, but larger adverse forecasts on Environmental Services and Policy & Corporate Governance. All other areas are indicating a break even or surplus for the year.

## **Detail**

### **Environmental Services**

- 3.4. Environmental Services are predicting a year end adverse variance of £87,000. This stems from salary savings of £7,000 on Food Safety, £10,000 of additional expenditure on salaries on Waste Services and £2,000 of additional miscellaneous costs and £9,000 of less income generation against £103,000 of positive variance against Budgets on Recycling. Parks & Cemeteries are predicting a break-even year end position, while the Town Centre and Market Halls Budget is indicating an overall adverse variance of £176,000, comprising £190,000 reduced income at the Market Hall and income from CCTV down by £10,000 less £13,000 of salary savings and £11,000 of miscellaneous cost savings.

### **Culture & Leisure Services**

- 3.5. Culture and Leisure Services are indicating a breakeven position by the year-end.

### **Planning & Transportation**

- 3.6. Planning & Transportation are predicting an adverse variance for the year of £21,000. This is due to a predicted shortfall in income compared to budget on Building Control of £65,000. Elsewhere on the Budget there are £17,000 of staff saving and £46,000 of additional income less £19,000 of miscellaneous additional expenditure.

### **Regeneration & Property Services**

- 3.7. Regeneration & Property Services are predicting an adverse variance of £8,000 at year-end with salary costs up by £109,000 over the year compared to budget and expected additional costs of £41,000, less £142,000 of additional income.

### **Policy & Corporate Governance**

- 3.8. Policy & Corporate Governance are predicting an adverse variance of £171,000. This stems from salary savings of £75,000 less the Corporate Savings Target for the year of £165,000, predicted increases of £150,000 on Housing Benefit Costs, along with £21,000 of additional miscellaneous costs less £90,000 of additional income.

### **Non Service Items**

- 3.9. The current estimate for the year is a positive variance of £321,000.

## 4. Alternative Options considered and Reasons for Rejection

4.1. Not applicable. This report is for information purposes.

## 5. Consultations

5.1. Not applicable

## 6. Implications

<b>Financial implications (including any future financial commitments for the Council)</b>	As outlined in the report.
<b>Legal and human rights implications</b>	Not applicable
<b>Assessment of risk</b>	Not applicable
<b>Equality and diversity implications</b> <i>A <a href="#">Customer First Analysis</a> should be completed in relation to policy decisions and should be attached as an appendix to the report.</i>	Not applicable

## 7. Local Government (Access to Information) Act 1985: List of Background Papers

Council Meeting 21st February 2019  
General Revenue Budget 2019/20  
The report can be found by clicking on this link  
[Budget 2019/20](#)  
And downloading the relevant PDF from that page.

**Budget Monitoring 2019/20**

**Period 4 to 31 July Summary - GF Revenue**

Description	Y-T-D Period 4			Month 4			Year		
	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance
	£	£	£	£	£	£	£	£	£
<b>Environmental Services</b>	1,718,503	1,680,400	38,103	404,321	339,999	64,322	5,256,729	5,344,011	-87,282
<b>Culture &amp; Leisure</b>	297,690	297,690	0	74,423	74,423	0	893,071	893,071	0
<b>Planning &amp; Transportation</b>	264,733	270,550	-5,817	66,183	72,000	-5,817	794,198	815,841	-21,643
<b>Regeneration &amp; Property Services</b>	557,554	654,554	-97,000	139,389	236,388	-96,999	1,672,663	1,680,663	-8,000
<b>Policy &amp; Corporate Governance</b>	995,241	1,166,241	-171,000	246,291	356,241	-109,950	2,995,799	3,166,799	-171,000
<b>TOTAL General Fund Services</b>	<b>3,833,721</b>	<b>4,069,435</b>	<b>-235,714</b>	<b>930,606</b>	<b>1,079,051</b>	<b>-148,445</b>	<b>11,612,460</b>	<b>11,900,385</b>	<b>-287,925</b>
<b>Non Service Items</b>	-182,060	-481,892	299,832	-39,515	-68,134	28,619	-618,183	-940,015	321,832
<b>TOTAL Net Expenditure</b>	<b>3,651,661</b>	<b>3,587,543</b>	<b>64,118</b>	<b>891,091</b>	<b>1,010,917</b>	<b>-119,826</b>	<b>10,994,277</b>	<b>10,960,370</b>	<b>33,907</b>
Contribution (from) / to GF Reserves							0	33,907	
<b>TOTAL Net Requirement</b>							<b>10,994,277</b>	<b>10,994,277</b>	<b>0</b>

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